



MINISTRY
OF AGRICULTURE, FISHERIES
AND FOOD

SECRETARY-GENERAL FOR
AGRICULTURAL RESOURCES
AND FOOD SECURITY.
DIRECTORATE-GENERAL FOR
THE HEALTH OF AGRI-FOOD
PRODUCTION AND ANIMAL
WELFARE

EXECUTIVE SUMMARY SHEET

Ministry/proposing body.	Ministry of Agriculture, Fisheries and Food/Directorate-General for Health in Agri-Food Production and Animal Welfare	Date	11/06/2026
Title of the standard	Royal Decree laying down basic rules on animal health, authorisation and registration of traditional zoological numbers of animals, and amending various rules.		
Type of report.	Normal ☒ Abbreviated ☐		
TIMELINESS OF THE PROPOSAL			
Situation regulated.	Laying down basic animal health, authorisation and registration rules for traditional zoological animal centres, amending several animal health and welfare rules accordingly.		

Objectives pursued.	This Royal Decree aims to adopt updated rules for the organisation of establishments housing animals other than production animals and (domestic) companion animals, which are now referred to as 'traditional zoological numbers of animals'. To ensure that all activities in places where animals likely to pose a risk to livestock farming are kept, and those not covered by other legislation, are carried out in such a way as to minimise the dangers to the health of animals and, therefore, of humans and the environment, ensuring animal welfare.
Main alternatives considered.	As these are basic rules, there are no alternative courses of action.
CONTENT AND LEGAL ANALYSIS	
Type of standard.	Royal decree
Structure of the Regulation	The draft consists of 18 articles, three additional provisions, three transitional, one repealing, and eleven final, together with four annexes.
Reports collected.	- 26.5.4th report of the Law on the Government of the Technical Secretariat-General of the Department - 26.5.5th prior approval of the Law on the Government of the Ministry for Digital Transformation and the Civil Service - 26.5.6th report of the Law on the Government of the Ministry of Territorial Policy and Democratic Memory - 26.5.1th report of the Law of the Government of the Ministry for Ecological Transition and the Demographic Challenge. - 26.5.1th report of the Law of the Government of the Ministry of Social Rights, Consumer Affairs and Agenda 2030. - 26.5.1th report of the Law on the Government of the Ministry of Health. - 26.9 report on the Law on the Government of the Ministry of the Prime Minister's Office, Relations with Parliament and Democratic Memory. - Technical standards and regulations. - Mandatory opinion of the Council of State in accordance with Article 22.2 of Law Orgánica 3/1980 of 22 April of the Council of State.
Hearing procedure.	Prior public consultation, public consultation and information, direct consultation of the Autonomous Communities and Cities of Ceuta and Melilla, and the bodies representing the sector.
ANALYSIS OF IMPACTS	

ALIGNMENT WITH THE ORDER OF COMPETENCES.	What is the prevailing legislative authority? This Royal Decree is issued under Article 149 (1), Rules 13, 16 and 23 of the Spanish Constitution, which confer on the State exclusive competence with regard to, respectively, the bases and coordination of the general planning of economic activity, the bases and general coordination of health, and basic legislation on environmental protection. The royal decrees that are amended in the first to ninth final provisions are based on the powers expressed therein.	
ECONOMIC AND BUDGETARY IMPACT.	Effects on the wider economy.	No significant effects
	As regards competition	☒ The regulation does not have significant effects on competition. ☐ the regulation has positive effects on competition. ☐ the regulation has negative effects on competition.
	In terms of the administrative burden	☐ ☒ Suggests a reduction of administrative burden. Quantification: EUR 64.610.000 ☐ it adds to the administrative burden. ☐ it does not affect administrative burdens.
	As regards budgets, the regulation ☐ It affects the budgets of the General State Administration. ☐ Affecting the budgets of other territorial administrations	☐ entails expense: Estimated quantification: ____ ☐ entails revenue. Estimated quantification: ____ X Budget not affected
GENDER IMPACT.	The impact of the regulation on gender issues is	Negative ☐ Null ☒ Positive ☐

OTHER IMPACTS CONSIDERED.	It has no impact on the family, children and adolescents, or on society or the environment. The standard has no impact on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.
OTHER CONSIDERATIONS	In accordance with Article 26 (3) (h) of Government Law 50/1997 of 27 November, it is stated that this project does not affect climate change.

REPORT ANALYSING THE REGULATORY IMPACT OF THE DRAFT ROYAL DECREE LAYING DOWN BASIC ANIMAL HEALTH RULES, AUTHORISING AND REGISTERING TRADITIONAL ZOOLOGICAL CENTRES AND AMENDING VARIOUS RULES.

This report is drawn up in accordance with Article 26 (3) of Government Law 50/1997 of 27 November and Royal Decree 931/2017 of 27 October regulating the Regulatory Impact Analysis Report.

I. TIMELINESS OF THE PROPOSAL.

1.- NECESSITY AND APPROPRIATENESS OF THE PROPOSED LEGISLATION.

Background

The current regulation for animals of non-livestock species is Decree 1119/1975 of 24 April on the authorisation and registration of zoological centres, equestrian establishments, centres for the promotion and care of pets and the like, and the Order of 28 July 1980 laying down rules on zoological centres, equestrian establishments, centres for the promotion and care of pets and the like.

Since its publication, various EU and national rules have affected this sector, in particular Law 8/2003 of 24 April, Law 32/2007 of 7 November on the care of animals during rearing, transport, experimentation and slaughter, Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law'), Commission Delegated Regulation (EU) 2019/2035 of 28 June supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards rules for establishments keeping terrestrial animals and hatcheries, and the traceability of certain kept terrestrial animals and hatching eggs, and Commission Delegated Regulation (EU) 2020/691 of 30 January 2020 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards rules for aquaculture establishments and transporters of aquatic animals.

Law 7/2023 of 28 March 2007 on the protection of animal rights and welfare also applies to dogs and ferrets.

Furthermore, these zoological centres are covered by Royal Decree 479/2004 of 26 March 2004 establishing and regulating the General Register of Livestock Holdings.

Need

The two basic principles of animal health legislation, applicable to the keeping of animals in any facility and to the natural environment, are based on the maxim of 'prevention is better than cure', and on the fact that the health of humans, the environment and animals is intimately intertwined.

The above-mentioned regulations regulate various aspects, including new obligations for the competent authorities and operators, in relation to authorisation and record-keeping, management, activity registration, staff training, veterinary assistance and management of by-products, among others. The requirements laid down in that legislation are directly applicable and must be complied with, in addition to those laid down at national level.

EU animal health rules focus on requirements aimed at preventing problems that could jeopardise the EU's internal market, and therefore emphasise intra-Community movement aspects.

These rules set out the animal species that can be considered as 'pet animal', regulating their maintenance and movement in a targeted manner, in order to minimise the existing risks to animal health in general, and to the keeping of food-producing animals, and thus to public health in particular.

The basic national legislation on the protection of animals is laid down in Law 32/2007 of 7 November 2007 on the care of animals during farming, transport, experimentation and slaughter, and in Law 7/2023 of 28 March 2007 on the protection of animal rights and welfare. Some establishments with animals fall outside the scope of these laws, although they are subject to animal health regulations.

Gradually, but steadily, since the beginning of the 21st century, rules have been adopted for the organisation of establishments where animals are housed, with the aim of reducing the risks that the activity carried out in those establishments may pose to humans, the environment or other animals. While, for animals kept for farming or scientific purposes, the national legislation has been updated, for those kept for other purposes, the national legislation in force dates from 1975 and 1980. For these sites, the term 'zoological nucleus' has become popular and has been used generically for a wide variety of establishments in various regional regulations, making it clear that there is a need to update the national legislation.

It is necessary to update this term for certain places, hereinafter referred to as 'traditional zoological centres', to distinguish them from the Zoological centres for pets, in order to ensure that any activity in places housing animals that could pose a risk to livestock farming, and those not covered by other legislation, is carried out in such a way as to minimise the dangers to the health of the animals and, therefore, to humans and the environment.

Opportunity

Decree 1119/1975 of 24 April on the approval and registration of zoological centres, equestrian establishments, centres for the promotion and care of pets and the like, and the Order of 28 July 1980 laying down rules on zoological centres, equestrian establishments, centres for the promotion and care of pets and the like, should be repealed as obsolete for the species and activities regulated in this legislation and in so far as they conflict with it.

In short, given that the legislation in force is exceeded by national legislation and by the directly applicable requirements of European legislation, it is necessary, for animal health reasons, to regulate these establishments, which in most cases have hitherto been considered zoological centres, without prejudice to the applicable environmental legislation.

In this way, the current legislation will not only regulate the proper functioning of economic activities requiring the use of animals, but also their harmonious development with the keeping of animals without any commercial activity, an activity that is increasingly widespread in today's society.

In view of the above, this project should now be processed.

2.- PURPOSE.

The purpose of this provision is to:

(a) Adopt updated rules for the management of establishments housing animals other than production and companion animals (domestic), which are now referred to as 'traditional zoological numbers'.

(b) To ensure that all activities in places where animals likely to pose a risk to livestock farming are kept, and those not covered by other legislation, are carried out in such a way as to minimise the dangers to the health of animals and, therefore, to humans and the environment, ensuring animal welfare.

3.- ALTERNATIVES

Given that it is a matter of adopting basic legislation, repealing old legislation, and that it creates obligations for individuals, it is necessary to approve this royal decree, without there being any other options for action, and without there being any possibility of soft law alternatives, given the mandatory (and not dispositive) nature of administrative law.

4.- COMPLIANCE WITH THE PRINCIPLES OF GOOD REGULATION

The principles of good regulation laid down in Article 129 of Law 39/2015 of 1 October 2015 on the Common Administrative Procedure of Public Administrations have been observed in the drafting of this legislation. Specifically, it complies with the principles of necessity and effectiveness, since it is the most appropriate instrument for ensuring that European legislation is applied uniformly throughout the national territory, thereby guaranteeing the general interest. It is also in line with the principle of proportionality, as there is no other alternative that is less restrictive of rights or imposes fewer obligations on recipients. With regard to the principles of legal certainty, transparency and efficiency, this standard is in line with these principles, as it is consistent with the rest of the legal system, stakeholder participation has been sought through the public information and participation process, and it repeals the aforementioned provisions in force to update the regulation already superseded by national and European Union legislation in order to contain all the regulation in the same legal instrument, reducing administrative burdens.

5.- ANNUAL REGULATORY PLAN.

For the purposes of Article 25 (3) of Government Law 50/1997 of 27 November, this rule is included in the Annual Regulatory Plan (PAN) for 2026, approved by Agreement of the Council of Ministers of 5 May 2026.

II. CONTENT.

The draft consists of 17 articles, divided into five chapters, three additional provisions, three transitional provisions, one repeal, and eleven final articles, together with four annexes.

Structure	Content
Article 1	Purpose and scope of application.
Article 2	Definitions.
Article 3	Classification of atypical establishments.
Article 4	Responsibilities and obligations of NNZZTT holders.
Article 5	Additional requirements for certain atypical establishments.
Article 6	Conditions on location and health separation.
Article 7	General conditions of buildings, installations, biosecurity, hygiene and equipment.
Article 8	Record book.
Article 9	General conditions on handling, management and animal welfare.
Article 10	Staff training.
Article 11	Conditions related to animal health.
Article 12	Identification of livestock
Article 13	Movement of animals.
Article 14	Registration.
Article 15	Authorisation or registration through a self-declaration.
Article 16	Checks.
Article 17	Penalties.
First supplementary provision.	No increase in staff expenditure.
Second additional provision	Adaptation of registers.
Third supplementary provision.	Write-offs.
First transitional provision	Registration and approval of establishments.
Second transitional provision:	Skills and distance.
Third transitional provision:	Deadline for adaptation.
Sole repeal provision.	Repeal of legislation.
First final provision	Amendment of Royal Decree 479/2004 of 26 March 2015 establishing and regulating the General Register of Livestock Holdings.
Second final provision	Amendment of Royal Decree 1547/2004 of 25 June 2007 laying down rules for the organisation of rabbit farms
Final provision 3.	Amendment of Royal Decree 1082/2009 of 3 July 2007

	laying down animal health requirements for the movement of animals from hunting, inland aquaculture and zoological centres, as well as wild animals.
Fourth final provision	Amendment of Royal Decree 804/2011 of 10 June 2007 regulating the zootechnical, health and animal welfare organisation of equine holdings and establishing the equine health plan.
Fifth Final Provision.	Amendment of Royal Decree 138/2020 of 28 January 2007 laying down the basic rules on health measures for game species acting as a reservoir for tuberculosis (<i>Mycobacterium tuberculosis</i> complex).
Sixth final provision.	Amendment of Royal Decree 306/2020 of 11 February 2007 laying down basic rules for intensive pig farms and amending the basic rules for extensive pig farms.
Seventh final provision.	Amendment of Royal Decree 637/2021 of 27 July 2007 laying down the basic rules for the management of poultry farms.
Eighth final provision.	Amendment of Royal Decree 787/2023 of 17 October 2007 laying down provisions to regulate the traceability, identification and registration system for certain species of kept terrestrial animals.
Ninth final provision.	Competence.
Tenth final provision.	Power of amendment
Eleventh final provision.	Entry into force.
Annex I	Maximum permitted sizes per species for certain types of traditional zoological nuclei.
Annex II	Health tests to be carried out in the shelters at the entry of the animals.
Annex III	Minimum content of the logbook.
Annex IV	Minimum content of training courses.

The traditional Zoological Numbers are considered to be the following:

- a) Zoos, including aquariums, authorised as such by the competent authority, as meeting the requirements of Law 31/2003 of 27 October 2007 on the conservation of wild fauna in zoos.
- b) Travelling circuses and animal acts within the framework of Commission Delegated Regulation (EU) 2019/2035 of 28 June 2019.
- c) School farms, intended to house ungulates or birds of the species hens, turkeys, guinea fowl, ducks, geese, quails, pigeons, pheasants, partridges and *ratites*, as well as carnivores other than dogs, cats and ferrets, coming from production/breeding holdings.
- d) Shelters for captive animals, other than pet animals, intended to house ungulates or birds of the species hens, turkeys, guinea fowl, ducks, geese, quails, pigeons, pheasants, partridges and *ratites*, as well as carnivores other than dogs, cats and

ferrets, coming from production/breeding holdings or holdings of unknown origin. These establishments, which shall under no circumstances be open to the public, may be:

1°. Permanent: animals are kept on a long-term basis until death.

2°. Temporary: it aims to return the animals to their owners, or to send them to another place where they are permanently housed.

e) Wild animal recovery centres.

f) Establishments keeping birds.

g) Quarantine establishments of Commission Delegated Regulation (EU) 2035/2019 of 28 June 2019 for terrestrial animals in Part B of Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016.

h) Establishments for dogs used in specific and professional activities (excluding rescue dogs that do not carry out their activity in a professional area):

1°. Hunting dogs (which are part of a packet, ankle or jaury).

2°. Surveillance and security dogs.

With regard to the content of the standard, the following should be noted.

The two basic principles of animal health legislation, applicable to the keeping of animals in any facility and to the natural environment, are based on the maxim of 'prevention is better than cure', and on the fact that the health of humans, the environment and animals is intimately intertwined.

The above-mentioned European Union legislation regulates various aspects, including new obligations for competent authorities and operators, in relation to authorisation and record-keeping, management, activity registration, staff training, veterinary assistance and management of by-products, among others. The requirements laid down in this legislation are directly applicable and must be complied with, in addition to those laid down at national level, which is implemented by this legislation.

EU animal health rules focus on requirements aimed at preventing problems that could jeopardise the EU's internal market, and therefore emphasise intra-Community movement aspects.

These rules set out the animal species that can be considered as 'pet animal', regulating their maintenance and movement in a targeted manner, in order to minimise the existing risks to animal health in general, and to the keeping of food-producing animals, and thus to public health in particular.

It is necessary to ensure that, also at national level, animal health risks are minimised, in order to ensure the health and welfare of animals, which are potentially affected not only by intra-Community but also by national trade.

At national level, Law 8/2003 of 24 April 2003 on animal health, which remains in force and applies to everything that does not contradict European Union and Community legislation, establishes that zoological centres are a type of holding. Furthermore, Royal Decree 479/2004 of 26 March 2015 establishing and regulating the General Register of Livestock

Holdings applies only to animal species of livestock interest, for the same purpose as European Union legislation.

The basic national legislation on the protection of animals is laid down in Law 32/2007 of 7 November and Law 7/2023 of 28 March on the protection of animal rights and welfare. Some establishments with animals fall outside the scope of these laws, although they are subject to animal health rules and are therefore regulated in this draft.

Gradually, but steadily, since the beginning of the 21st century, rules have been adopted for the organisation of establishments where animals are housed, with the aim of reducing the risks that the activity carried out in those establishments may pose to humans, the environment or other animals. While, for animals kept for farming or scientific purposes, the national legislation has been updated, for those kept for other purposes, the national legislation in force dates from 1975 and 1980. For these sites, the term 'zoological nucleus' has become popular and has been used generically for a wide variety of establishments in various regional regulations, making it clear that there is a need to update the national legislation.

It is necessary to update this term for certain sites, hereinafter referred to as 'Traditional Zoological Numbers', in order to ensure that any activity in places housing animals that could pose a risk to livestock activity, and those not covered by other regulations, is carried out in such a way as to minimise the health hazards to animals and, therefore, to humans and the environment.

In this regard, a particularly relevant aspect of recent years, not only at national and European Union level, but also at international level, is the fight against antimicrobial resistance, a priority reflected in Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2013, which highlights, in its recitals, the preventive role of the legal framework and the consequent expected reduction in the use of antibiotics in animals.

Already in 2011, the European Parliament adopted a non-legislative resolution on the matter, following which the Master Plan of Action on Antimicrobial Resistance (2011-2014) was established, stimulating the launch of national action plans. Spain adopted its first National Plan against Antibiotic Resistance (PRAN) in 2014. In the current one, which covers the period 2025-2027, it should be noted that one of its main pillars is the 'Prevention of the need for the use of antibiotics', Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive 2001/82/EC having been adopted.

As regards the movement of animals kept in such establishments, it must be ensured that food safety risks are not increased by the fact that animals of species traditionally supplying products of animal origin are kept for no such purpose. It is therefore appropriate, on the one hand, to ensure the approval and registration of those establishments and, on the other hand, to provide for certain restrictions on the movements of the animals housed therein.

For reasons of technical operability and integration into a register of the different types of holdings and animal establishments, the register of traditional Zoological Numbers will be integrated as a separate section within the general register of livestock holdings established in Article 3 of Royal Decree 479/2004 of 26 March establishing and regulating the general register of livestock holdings, which will be complied with as regards its operation.

Similarly, Law 8/2003 of 24 April 2003 on animal health, applicable to all domestic animals and wild fauna, provides that a situation of contagion between kept animals and wild fauna due to the same disease, as well as the possible creation of reservoirs in the natural environment, make health actions in both environments inseparable. To this end, Royal Decree 1082/2009 of 3 July 2007 laying down animal health requirements for the movement of animals from hunting farms, continental aquaculture and zoological centres, as well as wild animals, was published, establishing the animal health requirements applicable to the movement within Spain of animals of game species. Consequently, zoological nuclei of game species, those of birds for baking or decoying hunting of game species, and those of birds for colombiculture and colombophilia, as well as wild animal recovery centres, should be included in the traditional Zoological Numbers.

In order to ensure that the requirements laid down here are consistent with those laid down in other planning and health rules, these should be amended to specifically authorise and register the holdings covered by the rule. In this regard, Annex I sets a maximum number of animals, according to species, to be kept by atypical animal establishments (in accordance with animal health and welfare and environmental criteria, as is the case with other management rules), and if this number is exceeded it is stipulated that they will then be treated as holdings of species of livestock interest, governed by the relevant sectoral regulation (cattle, etc.) and only in addition by this Royal Decree.

Organic Law 10/1995 of 23 November 33 on the Criminal Code lays down, among the penalties and their categories (Article 39.), the 'Special prohibition on the exercise of a profession, trade or trade relating to animals and on the keeping of animals', of different duration depending on the seriousness of the offence. In order to ensure that this disqualification becomes effective, one of the requirements to be the owner of a traditional zoo is that the natural person who owns it, or, in the case of legal persons, the person who has effective management of it, must not be legally disqualified from exercising a profession, trade or trade involving animals or from keeping animals. That requirement shall apply, in the case of entities without legal personality, to all their members. For reasons of consistency with the rest of the legal system, this provision is also included in Royal Decree 348/2000 of 10 March transposing Directive 98/58/EC concerning the protection of animals kept for farming purposes.

The transition to the new regulation is regulated, with the adaptation period for the existing centres, the maintenance of the registers of those that fall within the scope of this Royal Decree, and the removal of those that are no longer regulated by law (pet animals, which are the subject of the draft Royal Decree on the Zoological Numbers of Pet Animals promoted by the Ministry of Social Rights, Consumer Affairs and Agenda 2030).

Moreover, the rules are laid down in line with the Royal Livestock Organisation Decrees, albeit with a broad content (which allows the Autonomous Communities considerable scope for implementing the rules), which is not as detailed as in the legislation on the sectoral organisation of livestock farming, in view of the special features of these types of establishment, always within the necessary health and welfare safeguards.

III. LEGAL ANALYSIS.

1. Legal basis and legal status.

The project is issued under the provisions of Article 149 (1), Rules 13, 16 and 23 of the Spanish Constitution (on environmental aspects, such as waste), which confer on the State exclusive competence with regard to, respectively, the bases and coordination of the general planning of economic activity, the bases and general coordination of health, and basic legislation on environmental protection.

As regards rank, the draft is issued in accordance with the authorisation contained in the fifth final provision of Law 8/2003 of 24 April 2003 on animal health and in the sixth final provision of Law 32/2007 of 7 November 2007 on the care of animals during rearing, transport, experimentation and slaughter.

From the point of view of formal legality, the draft complies with the general attribution to the Government of the exercise of regulatory power in Article 97 of the Constitution, given specific expression in favour of the Council of Ministers in Article 5 (1) (h) of Government Law 50/1997 of 27 November.

The suitability of the status of the proposed royal decree is also in accordance with Article 24 (1) (c) of Government Law 50/1997 of 27 November, which requires that decisions approving regulatory rules for the competence of the Council of Ministers take the form of royal decrees.

In this case, the circumstances justifying the status of the project (basic rule) being that of a royal decree are present. Thus, the doctrine of the Constitutional Court, since JCC 69/1988 of 19 April, FJ 5, insists that the review of the basic legislation requires that a dual substantive and formal sphere be assessed in it. The first responds to the need to ensure that the powers of the Autonomous Communities are not rendered meaningless or unconstitutionally restricted. The second seeks to ensure that the closure of the system does not remain in the permanent ambiguity that would amount to granting the State the power to apply surprisingly to the Autonomous Communities, as a basic rule, any kind of legal or regulatory provision whatever its rank or structure. The formal dimension of the basic legislation is governed by the principle of formal law '... because it is only through this legislative instrument that... a certain and stable determination will be achieved of the areas of organisation of the matters in which the basic powers of the State and the regulations of the Autonomous Communities come together and are articulated'. It is also stated that '... by way of derogation from that principle of formal law... the Government may make use of the regulatory power to regulate by decree any of the basic provisions of a matter, where they are, as a result of the competence of the latter, a necessary complement to ensure the purpose for which competence over the bases responds, so that the bases must not be formulated by means of normative instruments of a lower rank than the Law and the Royal Decree, which must, as a rule, accommodate them', being therefore the necessary supplementary regulatory rule for the purpose of guaranteeing the purpose for which the bases respond. According to the Court, this basic nature of the regulation may be inferred from the content and structure of the regulatory provision with this basic purpose (SSTC 197/1996, FJJ 5 and 24, and 118/1998, FJ 16). These factors are present in this case, where the essential aspects are laid down in Law 8/2003 of 24 April, Law 32/2007 of 7 November and the aforementioned European Union regulations, and technical aspects are laid down in this draft.

2. Relationship with other provisions of national and European Union law.

The standard is in line with European Union legislation, in particular Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law'), which assigns a number of responsibilities to operators in areas such as biosecurity, prudent and responsible use of veterinary medicinal products and disease prevention and control.

With regard to the relationship with other provisions of national law, this draft is included peacefully in our legal system, as it implements Law 8/2003 of 24 April and Law 32/2007 of 7 November on the surveillance, prevention and communication by the operator of the diseases present in its establishment, animal health obligations, authorisation and registration of atypical establishments, register book, animal welfare obligations and responsibilities, etc., which is consistent with the provisions of European legislation on animal health.

3. Entry into force and duration.

The twelfth final provision of the draft states that it will enter into force on the day following that of its publication in the Official State Gazette. It shall apply from that date, except for existing establishments that intend to be reclassified as atypical in accordance with the provisions of this Royal Decree, in which case it shall apply to them within 12 months of the date of its entry into force.

With regard to Article 23 of Government Law 50/1997 of 27 November 2003, this entry into force is justified in accordance with its second *paragraph in fine*, since the legislation must be immediately applicable in order to properly reorganise the sector to which it is addressed (hitherto part of the general framework of zoological centres), without prejudice to a precise margin for reclassification, in order to enable proper knowledge of the legislation and the aforementioned adaptation of existing establishments.

IV. ALIGNMENT OF THE RULE TO THE ORDER OF DISTRIBUTION OF COMPETENCES

The draft is issued under the provisions of Article 149 (1), Rules 13, 16 and 23 of the Spanish Constitution, which confer on the State exclusive competence with regard to, respectively, the bases and coordination of the general planning of economic activity, the bases and general coordination of health, and basic legislation on environmental protection.

The royal decrees that are amended in the first to ninth final provisions are based on the powers expressed therein.

The project complies with the doctrine of the Constitutional Court, which has established in JCC (FJ2) 192/1990 that 'As stated above in JCC 32/1983, even if epizootic diseases have to affect livestock, it is clear that the coordination of measures to combat them is also a competence in health matters. This means that it is necessary to take into consideration, when analysing the contested Order, not only the competence of agriculture, which is the exclusive competence of the Generalitat, but also the competence of the State in the field of

health, since the impact of that disease in the field of health means that account must also be taken of the competence of the State in the field of health, which also includes the area of epizootic diseases.'

STC 32/1983 has already established the meaning of coordination, stating that it 'aims to integrate the diversity of parts or subsystems into the whole or system, avoiding contradictions and reducing dysfunctions that, if they persist, would prevent or hinder the very reality of the system' (FJ 2). Next, the same judgment has an impact on the general coordination competence of the State, noting in this regard "the following clarifications: ... (c) State competence for general coordination means not only that it is necessary to coordinate parts or subsystems... but also that this general coordination is a matter for the State' (FJ 2). Coordination is a power which is closely linked to legislative powers, so that the holder of those powers has that power as an inherent complement. And STC 104/1988 of 8 June states that 'the specific manifestations of coordination that appear in our Constitution (Articles 149.1, 13, 15, 16, etc.) as an additional competence to a limited regulatory competence cannot be reduced or confused with the general functions of coordination that belong to the State when its regulatory powers are full, given that the State cannot in any way disregard the implementation of State legislation at Autonomous Community level. This allows for possible forms of regulatory intervention that establish rules that fulfil a coordinating role for the regional administrations among themselves and with the State'(FJ 2). Account must also be taken of the broad doctrine established by the Constitutional Court (SSTC 32/1983, 42/1983, 90/1985, 13/1988, 171/1996, etc.), according to which the principle of coordination makes it possible, in essence, to articulate the competences of the State and the Autonomous Communities, with the aim of avoiding contradictions or reducing dysfunctions which, if they persist, would respectively prevent or hinder the very reality of the system. In particular, it has been said that general coordination should be understood as the establishment of means and relationship systems enabling mutual information, technical homogeneity in certain aspects and joint action by the State and Community authorities in the exercise of their respective competences, so as to achieve the integration of partial acts into the overall system (STC 32/1983, in relation to competences in the field of health). Under that power, it is legitimate for the State to lay down specific coordination measures.

In the area of animal welfare, Constitutional Court Judgment 58/2015 of 18 March 2015 (Full Court. Judgment 58/2015 of 18 March 2015. Positive conflict of competence 5937-2011. Raised by the Government of the Generalitat of Catalonia in relation to various provisions of Royal Decree 804/2011, of 10 June, regulating the zootechnical, health and animal welfare organisation of equine holdings and establishing the equine health plan. Powers relating to the general organisation of the economy, livestock farming and health: constitutionality of the State provisions on the minimum conditions to be met by equine holdings, holding books and official control health programmes (STC 158/2011) provides that the area most directly affected in this case is animal health, in which animal welfare must be circumscribed by the close relationship it has with it, and that the sixth provision of Law 32/2007 of 7 November 2007 on the care of animals during farming, transport, experimentation and slaughter authorises the Government, within the scope of the State's powers, to adopt any provisions necessary for the application and implementation of this Law.

Finally, with regard to Rule 23 of the Spanish Constitution, JCC 69/2013 of 14 March, FJ1, made clear the cross-cutting nature of this title of competence (in line with this draft Royal

Decree): "... The third criterion to be taken into account is that relating to the scope of the 'cross-cutting effect' that the basic environmental guidelines may have, not on the implementing legislation and implementation in the field of the environment itself, but on the sectoral competences of the Autonomous Communities with which they intersect and which are directly involved (spatial planning, hunting, river and lake fishing, inland fishing, shellfishing, tourism, leisure and free time, community development and research, among others).

We should dwell on this point and state that the cross-cutting effect of the State's competence, which is limited to the basic area (Article 149.1.23 of the Spanish Constitution), will be in accordance with the constitutional order of competences, in its conditioning of the sectoral competences of the Autonomous Communities, when that effect results in the imposition of limits on sectoral activities due to the significant negative impact that the ordinary exercise of the sectoral activity in question may have.... Where that is the case, the limits imposed may be classified as basic rules under Article 149.1.23 EC.'

V. DESCRIPTION OF THE PROCEDURE.

This provision shall be processed in accordance with the provisions laid down in the second paragraph of Article 26 of Law 50/1997 of 27 November 1997 on the Government.

The prior public consultation provided for in Article 26 (2) of Law 50/1997 of 27 November was carried out between 28 January and 11 February 2026. Annex I contains a summary table of the comments received and the position of this Ministry on the matter.

The report referred to in Article 26 (9) of Law 50/1997 of 27 November has been requested from the Ministry of the Presidency, Justice and Relations with Parliament in order to ensure the coordination and quality of the Government's regulatory activity, in accordance with the provisions of Order PRA/244/2018 of 12 March determining the date of entry into operation of the Regulatory Coordination and Quality Office.

In the mandatory processing of this project, the Autonomous Communities and cities of Ceuta and Melilla, and sector entities have been consulted, and the public hearing and information, required under Article 105 (a) of the Spanish Constitution, has been carried out via the department's web portal in accordance with Article 26 (6) of Government Law 50/1997 of 27 November. Annex II to this report contains a summary of the arguments received and the opinion of this Ministry in this regard.

The 26.5 6th paragraph of Law 50/1997 of **16 March** of the Government of the Ministry of **Territorial Policy and Democratic Memory** was received on **27 November** with a comment that was taken into account in the final wording of the text.

On 1 April, the mandatory report **26.5 (1) of Law 50/1997** of 27 November was received from the Government to the Ministry for the **Ecological Transition and the Demographic Challenge**, with a number of comments that have been addressed in the final wording of the text.

Likewise, on 13 March, the mandatory report **26.5 paragraph 1** of Law 50/1997, of 27 November, was received from the Government to the **Ministry of Health**, with no comments.

We also received on 26 March report **26.5 paragraph 1** of Law 50/1997 of 27 November from the Government to the **Ministry of Social Rights, Consumer Affairs and Agenda 2030**, which made a number of comments that were assessed in the table attached to this report.

On 19 May, report 26.5, paragraph 4, of Law 50/1997 of 27 November of the Technical Secretariat-General of the Department was obtained.

This draft shall be subject to the procedure for the provision of information in the field of technical standards and regulations and of regulations relating to information society services, governed by Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services and by Royal Decree 1337/1999 of 31 July, in order to comply with Directive 98/34CE of the European Parliament and of the Council of 22 June.

In accordance with Article 26 (5) (5) of Law 50/1997 of 27 November, the prior approval of the Minister for Digital Transformation and the Civil Service will be requested.

Finally, the mandatory opinion of the Council of State will be requested, in accordance with Organic Law 3/1980 of 22 April 2015 on the Council of State.

VI. ANALYSIS OF IMPACTS

ECONOMIC AND BUDGETARY IMPACT

a. Economic impact.

An analysis of the economic impact of this project is carried out pursuant to Article 26 (3) (d) of Law 50/1997 of 27 November, Article 2 (1) (d) (1) of Royal Decree 931/2017.

The agents concerned are the owners of atypical establishments.

The new rules will not impose significant economic obligations on these entities, so this project has no significant impact on these activities, nor on the economy in general. It is considered that most of the existing zoological centres will not need to make major adaptations to the requirements, as they are essentially similar to those provided for in the legislation currently in force, and would in any case focus on small works (separation of feed, etc.), costing no more than EUR 50.000.

With regard to the new centres that may be opened since the entry into force of the Royal Decree, the expenditure would be the current increase of EUR 50.000, which could be estimated at one and a half million euros (average estimated cost of opening, for example¹, a school farm and an animal shelter²) per centre, an amount that is acceptable for centres

¹ Estimate taking into account that upfront costs include technical fees (EUR 1.500-2.500) and construction fees, in addition to land and fitting-out of installations (EUR 1.700.000) and licences and permits (an estimated 10 %). Operational expenditure, operational expenditure (staff, animal feed, etc.) are not taken into account as they are already specific to the activity, as is the margin of viability. This results in a cost of EUR 2.000.000.

² Estimate taking into account the same parameters, but with rent for the land, and the need for less civil engineering work, with possible box facilities for each animal ranging from EUR 10.000, etc. Average of EUR 1.000.000.

from the point of view of commercial activity (zoological parks, etc.) or voluntary activity (with a wide possibility of public subsidies and aid, in addition to private collaboration through donations, crowdfunding, etc.).

Effects on competition in the market.

The project does not have an effect on competition in the market as it does not introduce elements that distort competition, does not involve restrictions on new entrants, nor does it limit the freedom of operators to compete.

SME test

It should be noted that the interests of small and medium-sized enterprises (mostly non-commercial), such as the majority of atypical establishments, have also been taken into account in the development of the standard, thereby reducing administrative burdens, while providing appropriate legal certainty for their actions.

b. Impact on the General State Budget.

The project does not entail an increase in public expenditure or a decrease in the revenue of the General State Administration. The measures included in this instrument shall not result in any increase in allocations, payments or other staffing costs.

The costs of the actions for the administrations are minimal, as they are the usual costs of the control processes in this area.

IMPACT ON ADMINISTRATIVE BURDENS.

Administrative burdens are all tasks of an administrative nature that businesses and citizens must carry out in order to comply with the obligations arising from the legislation.

With regard to the possible generation of these burdens by the project, Article 2 (1) (e) of Royal Decree 931/2017 of 27 October regulating the Regulatory Impact Analysis Report requires the content of the report to 'identify and measure these administrative burdens'.

As a result, an analysis of the impact of the proposal is carried out, identifying all the burdens that have undergone changes compared to those laid down in the current regulation and estimating their economic quantification using the 'Simplified method for measuring administrative burdens'.

Burdens of the current regulation.

Article 1 of Decree 1119/1975 of 24 April provides for the application for authorisation.

Article 3 of the Order of 28 July 1980 provides for two programmes (comparable to a report on memory).

Estimated population: 70.000, which are estimated to be atypical establishments under the project), of the currently existing 90.000 zoological centres.

Administrative obligations	Article	Load	Cost (EUR)	Frequency	Population	Annual cost
Request	1 Decree 1119/75	1	80	1	70.000	5.600.000
2 programmes	3rd order of 1980	10	500*2	1	70.000	70.000.000
ANNUAL COST OF ADMINISTRATIVE BURDEN						EUR 75.600.000

Project charges.

The project provides for the following burdens:

Article 4: census declaration

Article 8: keep a logbook.

Article 15: application/self-declaration.

Estimated population: 45.000 of the current 90.000 zoological centres.

Administrative obligations	Article	Load	Cost (EUR)	Frequency	Population	Annual cost
Census declaration	4	6	2	1	70.000	140.000
Log-record	8	15	150	1	70.000	10.500.000
Request	14	2	5	1	70.000	350.000
ANNUAL COST OF ADMINISTRATIVE BURDEN						EUR 10.999.000

Total burden reduction: EUR 64.610.000

EFFECTS ON COMPETITION AND MARKET UNITY.

The project does not have an effect on competition in the market as it introduces elements that distort competition in the market, does not involve restrictions of new entrants, nor does it limit the freedom of operators to compete.

This provision does not affect Law 20/2013 of 9 December 2013 on market unity.

GENDER IMPACT

The gender impact of the project is null and void within the meaning of Article 26 (3) (f) of Government Law 50/1997 of 27 November.

The purpose of gender impact reports is to analyse and assess the results that can be followed from the adoption of the standard from the perspective of eliminating inequalities and their contribution to achieving the objectives of equal opportunities and equal treatment of women and men on the basis of the indicators of the baseline situation, the forecast of results and the forecast of impact. The gender impact report is a basic tool for obtaining information on the social reality, from a gender perspective, of all citizens on which the legislation will have an impact in order to identify and assess the different results that the apparently neutral regulatory provisions could produce on women and men; in short, to appreciate the possible inequalities that exist and the possible effects that the proposed rule may have on both sexes.

Thus, the gender impact of the project is null and void, within the meaning of Article 26 (3) (f) of Government Law 50/1997 of 27 November and Article 19 of Organic Law 3/2007 of 22 March for the effective equality of women and men, given that it is a technical rule governing atypical animal establishments; consequently, no effects on equality on grounds of sex can be discerned, having analysed the material reality on which that provision operates and its scope of application as referred to above.

IMPACT ON THE FAMILY.

Nor does it have any impact on the family, in accordance with the tenth additional provision of Law 40/2003 of 18 November 1996 on the protection of large families, since, as stated above, it is a technical rule governing atypical animal establishments.

IMPACT ON CHILDREN AND ADOLESCENTS.

It has no impact on children and adolescents, as required by Article 22d of Organic Law 1/1996 of 15 January 1996 on the legal protection of minors, as it is a technical rule governing atypical animal establishments.

SOCIAL AND ENVIRONMENTAL IMPACT.

The standard has no direct social or environmental impact.

IMPACT ON EQUALITY AND ACCESSIBILITY.

The standard has no impact on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.

IMPACT DUE TO CLIMATE CHANGE.

The impact of this project, in terms of climate change mitigation and adaptation, is zero.

IMPACT IN THE AREA OF DIGITAL GOVERNMENT

In accordance with Article 2 (1) (d) (2) of Royal Decree 931/2017 of 27 October regulating the regulatory impact analysis report, the project does not involve the development or use

of digital government resources and services, which could have an impact on citizens or the administration.

VII. EX POST EVALUATION

In accordance with Article 28 (2) of the Law on the Government, Articles 2.5 and 3 of Royal Decree 286/2017 of 24 March regulating the Annual Regulatory Plan and the Annual Regulatory Evaluation Report of the General State Administration and creating the Regulatory Planning and Evaluation Board and Article 2 (j) of Royal Decree 931/2017 of 27 October, the standard is not among those that can be assessed as none of the cases provided for by law to make such an assessment mandatory exist.

Madrid, 11 June 2026.

ANNEX I

COMMENTS RECEIVED DURING THE PREVIOUS PUBLIC CONSULTATION

Part A. Entities having sent reports/observations

Autonomous Communities:

Sectoral organisations:

- Union of Unions

Other associations:

- National Association for the Defence of Animals (ANDA)
- AnimaNaturalis International Foundation
- APA ADAS Sigüenza Animal Defence Association
- Animal Defence Brigade Association
- FEDERATION OF DEAN ASSOCIATIONS (ANIMAL DEFENCE CANTABRIA)
- Ilustre Colegio de la Abogacía de Tarragona (ICAT) (Tarragona Bar Association)
- ZOONIA ASSOCIATION
- Association for the Protection of Animals in La Rioja
- Plataforma Balear per a la Defensa dels Animals (BALDEA)
- INTERCIDS, Legal Operators for Animals
- Animal Shelter Standards Foundation (FASS)
- HAIEKIN Association, "Towards Animal Conscience"
- Empathy Without Borders
- Association Plataforma La Tortura No Es Cultura
- Royal Spanish Hunting Federation (RFec)
- Malaga Animal and Plant Protection Society
- ARRECAL – "ASSOCIATION OF SPANISH REGIONAL PACKS OF HUNTING AND FREEDOM"
- Animal protector Palma del Río

Other:

- Cristina Olmos Sáez with NIC 52477966Q
- José Luis Pérez Castillo DNI 50817430B
- Antonio Víctor Villalobos Torres DNI74827326T

- TINA Veik
- Susana Chamizo Tapia DNI 02890964W
- Sergio Crespo Barranco DNI 46862264V

A total of 18.357 submissions have been received.

**Part B. Comments on the Draft FOR ESTABLISHING BASIC RULES OF ANIMAL HEALTH,
AUTHORISATION AND REGISTRATION OF TRADITIONAL ZOOLOGICAL CENTRES AND AMENDING VARIOUS RULES.**

ALLEGATIONS	Comments made by:	Comment	SGHAT assessment
1	— AnimaNaturalis International Foundation — 17.039 citizens' submissions (some unidentified) sent via email webmaster@animanaturalis.org	We consider it essential that the future Royal Decree expressly and restrictively delimit its scope, excluding those cases which already have specific regulations or which, by their nature, should not be included in the logic of animal health. We expressly request that the future Royal Decree clearly, expressly and unequivocally exclude: ● hunting dogs, ● dogs used for recreational, sporting or traditional activities, and, in general, all dogs kept by natural or legal persons outside an animal production context. We consider it essential that the future Royal Decree expressly exclude non-profit sanctuaries and rescue centres, or provide for a specific regime adapted to their nature and purpose, in coordination with animal protection legislation.	Partially accepted. The future legislation should cover all the zoological areas of animals to which Law 7/2023 of 28 March 2007 on the protection of animal rights and welfare does not apply, given that they are not covered by the Royal Decree on zoological centres for pets currently being processed, in order to ensure the proper coherence of our legal system. This is without prejudice to the fact that the requirements will be laid down according to the animal species and the health

			priorities to be met by the centres in accordance with the health priorities in each case (zoonoses, etc.).
2	APA ADAS SIGÜENZA ANIMAL DEFENCE ASSOCIATION PROVINCIAL UNION OF ASSOCIATIONS CER METHOD OF REAL CITY — SANTAELLA SECOND CHANCE SHELTER — ASSOCIATION JUMPS A GATITE PEÑA UNIÓN ANTITAUINA — NGO ADDA – ASSOCIATION FOR THE PROTECTION OF ANIMAL RIGHTS — FEDERATION OF DEAN ASSOCIATIONS (ANIMAL DEFENCE CANTABRIA) ZOONIA ASSOCIATION ASSOCIATION FOR THE PROTECTION OF ANIMALS IN RIOJA ANIMAL SHELTER STANDARDS FOUNDATION (FASS) — RIVER PALM ANIMAL PROTECTOR — 1.264 citizens' submissions (some unidentified)	1. That all dogs are pet animals, as laid down in Law 8/2003 of 24 April 2003 on Animal Health in its definitions, and that, therefore, all establishments housing dogs, including those intended for hunting or professional activities, are regulated in the Royal Decree on Zoological Numbers of Pet Animals, promoted by the Ministry of Social Rights. 2. That establishments housing dogs of any type or activity within the scope of the future Royal Decree on Traditional Zoological Numbers should not be included.	Not acceptable. As stated above, the future legislation must cover all the animal zoological centres to which Law 7/2023 of 28 March 2007 does not apply, since they are not covered by the Royal Decree on the zoological centres of pets currently being processed, in order to ensure the proper coherence of our legal system. Furthermore, this future Royal Decree is based on Law 8/2003 of 24 April 2003 on animal health, and its regulation is essentially health (without prejudice to the fact that it will also cover the necessary aspects of animal welfare). In any event, a Royal Decree is approved by the Council of Ministers, and it is

			therefore irrelevant, for this purpose, whether the Department is the initiator of a regulation.
3	— NATIONAL ASSOCIATION FOR THE PROTECTION OF ANIMALS (RWANDA) — 24 citizens' submissions (some unidentified)	Better to include all dogs (including hunting dogs) in the same legal text, for reasons of legal rationality and technical and legal uniformity. They suggest that the RD should not include a section dedicated to hunting dogs so that they fit into and are covered by the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda through its draft Royal Decree on Zoological Numbers.	Not acceptable. We reiterate the reasons already set out regarding the proper coherence of our legal system.
4	MIAU LEMOS ASSOCIATION — BISBALGAT ASSOCIACIÓ	1. To expressly exclude any differentiated regime that reduces the guarantees for hunting or working dogs. 2. Ensure full protection of all dogs under Law 7/2023 and supervision of DG Animal Rights. 3. Avoiding the creation of differentiated regulatory categories that create legal uncertainty or loss of administrative control.	Not acceptable. We reiterate the reasons already set out regarding the proper coherence of our legal system. On the other hand, the inclusion of hunting dogs, shepherds or other dogs, excluded from the scope of Law 7/2023 of 28 March, does not mean that they have to have a lower level of protection in their welfare.
5	— Cristina Olmos Sáez	1. animals of the dog species that have not been included in Law 7/2023 of 28 March because they are animals performing work do not have different psychological and physiological requirements than members of the same species that are included in this Law. If anything, it should be considered on the basis of its worker animal profile:	Partially accepted. The standard shall include the necessary animal welfare provisions, although appropriate to the

		Minimum measures and conditions of sunshine/temperature/floor of housing units, Housing that respects the physical and psychological development of the animals; Periodic biannual reviews with health and work ability certificates issued by registered veterinarians; — Maximum working hours; Planning the retirement of animals to enable them to become pets and become covered by Law 7/2023; The obligation to take out veterinary equalisation or insurance throughout the animal's working life. 2. similarly, animals of other species not included in Law 7/2023 and performing work for humans (e.g. sports horses; equidae for draught, livestock work, bullfighting, etc.) should also be regulated with regard to maximum working hours, weather conditions that determine their use, veterinary reviews and certifications, and retirement plans. 3. in the case of animals of livestock species subject to specific health regulations, animals that are not intended for animal production and are kept as pets without being reintroduced for farming purposes may be identified with a subcutaneous microchip instead of using ear tags designated for livestock species. The animal's veterinary record must state that it is not appropriate for livestock production.	situation of the animals and the task they carry out, but without humanising them, and taking into account, in the case of dogs, the task for which they are held, or, in the case of other species, the necessary provisions which duly guarantee animal and public health. It should be borne in mind that this will be a basic rule, and therefore provision should be made for the Autonomous Communities to have the necessary scope for implementing legislation, which may, if they deem it appropriate, include aspects such as those set out in this claim.
6	— José Luis Pérez Castillo	The Directorate General for Animal Rights has no competence in animal health and therefore cannot draft a separate decree.	Not acceptable. It is not the subject of the future rule.
7	Union of Unions	It is requested that there should be no reduction in obligations in matters such as animal health, welfare, identification, traceability and hygiene in relation to the legislation in force.	Finding accepted. The standard shall contain the necessary animal health and

		It is proposed that the Royal Decree includes specific measures to ensure that animals from traditional zoological centres: - Are identified and fully registered. - Maintain traceability equivalent to that of production animals or livestock holdings. - Have a registration system that is continuously updated, in order to avoid the risk of animals entering the food chain without control, and to maintain a traceability and control system.	welfare guarantees, according to the species and functions of the animals concerned.
8	— Antonio Víctor Villalobos Torres	I request that the future Royal Decree: — Expressly recognise the hunting dog as a working animal. — Remain part of traditional zoological centres or specific rural arrangements. — Avoid treating them in the same way as urban pets. — Ensure technical, proportionate and adapted regulation to the reality of hunting. This will protect both the actual welfare of the animal and the continuity of a historical, legal and necessary activity for the management of the natural environment.	Partially accepted. The standard shall contain the necessary animal health and welfare guarantees, according to the species and functions of the animals concerned. Game animals are in any event different from animals for grazing or keeping.
9	— Tina Veik	Suggestions to improve the protection of dogs used in specific activities: 1. Registration and Traceability: The regulatory development ensures strict supervision of the breeding and final destination of these animals to avoid mass abandonment after the hunting season. 2. Accommodation conditions: The definition of minimum standards of space, hygiene and welfare for the cheniles or facilities where these dogs are kept, equivalent to those of any other pet animal. 3. Mandatory inspections: Regular inspection protocols are established by the competent authorities.	Partially accepted. The standard shall contain the necessary animal health and welfare guarantees, according to the species and functions of the animals concerned. Specifically, the identification and traceability of dogs is already regulated in

		4. Equal Protection: That being considered as “animals of specific activities” does not lead to a reduction in protection against physical or psychological abuse compared to other domestic dogs. As a follow-up to my previous communication and in view of the upcoming regulatory development of the law, I would like to add two points that I consider essential for the effective protection of hunting dogs: 1. Identification and Microchip: I call for the strict requirement of microchip identification to be maintained from the first month of life, with no exceptions for its activity, in order to ensure full traceability of the animal and avoid anonymity in the event of abandonment. 2. Hardening of sanctions: It is necessary for the Royal Decree to specify severe financial penalties and disqualifications from keeping animals for those who violate welfare standards, so that punishment has a real deterrent effect against mistreatment.	another law, and penalties are already provided for in Law 8/2003 of 24 April and in the Criminal Code for the most important aspects of animal welfare, regardless of the fact that a Royal Decree cannot establish a system of penalties (reserved for rules with the status of a Law in accordance with Article 25 of the Spanish Constitution). The Autonomous Communities will carry out the usual checks.
10	— Susana Chamizo Tapia	1. OPPOSITION TO LIVESTOCK TREATMENT: Hunting dogs are, by definition biologically and socially linked, pet animals. I request that their stay in zoological centres (packs of hunting hounds) be regulated under the welfare standards of pets and not under livestock production regulations. 2. PLANT CONDITIONS: It is essential that the standard lays down minimum requirements for space, ventilation, thermal insulation and natural light for each individual, explicitly prohibiting permanent chaining and overcrowding in zules or precarious installations. 3. CONTROL OF REARING: Hunting zoos must not be an administrative ‘black hole’. Mandatory sterilisation or strict control of reproduction should be required in	Partially accepted. The standard shall contain the necessary animal health and welfare guarantees, according to the species and functions of the animals concerned. Game animals are in any event different from animals for grazing or keeping. Similarly, a royal decree may not amend a law (in accordance with the

		order to avoid the surplus of animals that ultimately nourishes the numbers abandoned in Spain. 4. MANDATORY INSPECTIONS: I call for the establishment of a system of annual official veterinary inspections for all packs of packs of hunting hounds, in order to guarantee the state of health and the correct identification (microchip) of all specimens. 5. INCLUSION OF HUNTING DOGS IN THE CURRENT ANIMAL WELFARE ACT: In short, to treat hunting dogs in the same way as other dogs, as laid down in the current Animal Welfare Law.	principle of the hierarchy of norms).
11	— BALEARIC PLATFORM PER LA DEFENSA DELS ANIMALS, (BALDEA)	If we do not accept the proposal that hunting dogs should be regulated under the Zoological Decree drawn up by the Directorate-General for Animal Rights, Ministry of Social Rights, Consumer Affairs and Agenda 2030, we would like to emphasise the following: - The need for daily care and contact with the carer. - The housing or housing of these animals must be spaced and in accordance with current standards and not the typical small cage. - We consider it very important not only to have a sufficiently well protected inner part to recover from the cold, but also to have a good duck so that the animal can be out of the sun in summer. Both roofs need to be well insulated especially due to the high summer temperatures, but also due to the low winter temperatures and humidity suffered by many Autonomous Communities. - As regards riding centres, there are still stables with too little space where horses have practically no space to go, but the most serious thing is that they do not go out daily, sometimes only once a week, and	Partially accepted. The standard shall include the necessary animal welfare provisions, although appropriate to the situation of the animals and the task they carry out, but without humanising them, and taking into account, in the case of dogs, the task for which they are held, or, in the case of other species, the necessary provisions which duly guarantee animal and public health. It should be borne in mind that this will be a basic rule, and

		this is unacceptable. Daily exercise should be ensured if they do not have access to free space on a continuous basis. - Sanctuaries should be able to house horses and livestock in free spaces with suitable ducks. Hunting dog sanctuaries should also be able to live in free spaces, especially those living together in groups. Autonomous communities should have the capacity to manoeuvre, given that the characteristics of each community sometimes differ significantly, such as the difficulty of having land available, restrictive urban planning rules that often forget animals, climate change, etc.).	therefore provision should be made for the Autonomous Communities to have the necessary scope for implementing legislation, which may, if they deem it appropriate, include the necessary aspects. However, it should be borne in mind that riding centres are not included in this future Royal Decree.
12	INTERCIDS, LEGAL OPERATORS FOR ANIMALS	1.The legal definition of ‘pet animals’ does not correspond – as the text of this public consultation suggests – to the scope of Law 7/2023 of 28 March. What is legally considered to be a ‘pet animal’ is defined in Article 3 (3) of Law 8/2003 of 24 April on animal health, as follows: <i>Pet or pet animal: Kept domestic or wild animals kept by humans, mainly in the home, provided that they can be kept in good welfare conditions that respect their ethological needs, that they can be adapted to captivity and that their keeping is not intended for consumption or the use of their produce or any industrial use or any other commercial or profit-making purpose and that, in the case of wild animals, their species is included on the positive list of pet animals. <u>In any case, dogs, cats and ferrets, regardless of the purpose for which they are intended or the place where they are kept or where they come from, shall be considered to be pet animals.</u> Production animals shall only be considered as pet animals if, losing their productive purpose, the owner decides to register them as pet animals in the Register of Pet Animals.</i>	Partially accepted. The future legislation should cover all the zoological areas of the animals to which Law 7/2023 of 28 March does not apply, Article 1 (3) of which excludes certain types of pet animals (hunting pears, etc.), which must be regulated in this future project, given that they are not within the scope of the Royal Decree on zoological centres of pet animals currently being processed, in order to ensure the proper

		The coexistence of two royal decrees of zoological centres for animals of the same species is legally unjustified and would entail: (a) Lack of legal certainty as regards the determination of a zoological nucleus, and even disparity of legal requirements, where animals of the same species are treated differently in the same location or establishment. b) Legal vaccinations that compromise and negatively impact animal health and welfare requirements. (c) Confusion and practical implementation difficulties for administrations and authorities, added to an already extensive and complex set of rules. d) Overlaps and conflicts of competence in the practical application of this legislation, to the detriment of compliance with it and the proper functioning of public services. (e) Doubling of authorisations and licences, registrations and inspections, with unnecessary additional administrative burden contrary to the administrative principles of effectiveness and efficient use of public resources. (f) Complexity added in the set-up and functioning of administrative records, and in their interoperability. (g) Problems of traceability and encouragement of fraudulent behaviour in the registration of nuclei and animals.	coherence of our legal system. This is without prejudice to the fact that the requirements will be laid down according to the animal species and the health priorities to be met by the centres in accordance with the health priorities in each case (zoonoses, etc.). It does not appear that there will be, as a result, problems of overlapping, application or control of the rules, or duplication of burdens (all the rules will be contained in a single royal decree).
13	Sergio Crespo Barranco	The relevant legislation is rather disparate and the situation should be exploited in order to merge the whole text into a single text, for reasons of legal certainty and to control possible provisions that are contrary to higher-ranking rules in force such as the Civil Code or Law 7/2023 on Animal Welfare.	Partially accepted. The future provision will lay down the rules applicable to traditional Zoological Areas in a single provision. However, it is not the purpose of the

		The importance of incorporating the <i>One Health</i> approach into the new legislation. Biologists, as a multidisciplinary profession in all three fields, are essential if good health control is to be carried out. There must be clear protection of the environment and hunting, with an administrative order for the killing of invasive species in these zoos. The legislation must be in line with Law 7/2023, but feline colonies as zoological nuclei are a problem that violates Article 45 of the Constitution. The rules should protect hunting dogs. This is in line with Law 17/2021, which created Article 333a of the Civil Code, which recognises animals as sentient beings. Effective remedies must be established for effective judicial protection, both in the intervention of traditional zoological centres and in their defence against the administration under Articles 24 and 106.1 of the Constitution. —It would be important to go into greater detail than what is intended in the new legislation.	provision to provide for the role of biologists, irrespective of the fact that it is not a health profession, with the result that their involvement in the <i>One Health</i> concept is not understood. This rule will always be applied taking into account the other applicable rules, such as the rule on invasive species, which will obviously be applied in its own terms, but it is a health and animal welfare rule of the conditions that traditional Zoological Numbers must meet, so, for example, it cannot regulate feline colonies, etc.
14	HAIEKIN ASSOCIATION, 'TOWARDS ANIMAL CONSCIOUSNESS' EMPATHY WITHOUT BORDERS — TORTURE PLATFORM ASSOCIATION IS NOT CULTURE ANIMAL GUARDIANS FOUNDATION SPAIN	In order to ensure that the standard is consistent with the biological and legal reality of the animals concerned, we request: 1. Strict differentiation: That hunting dogs and dogs of any kind of activity are formally recognised as pets. 2. Scoping: That the concept of 'traditional core' be redefined with restrictive criteria so as not to absorb heterogeneous realities arbitrarily. 3. Legal certainty: Any backsliding on standards of protection is avoided by the express exclusion mentioned	It is accepted in essence, given that hunting dogs and other activities are already pet animals within the meaning of Law 8/2003 of 14 April 2007, and the legislation will contain the necessary animal welfare aspects,

		above.	but its purpose, it is stressed, is not to regulate the animal welfare aspects of these dogs, but of the establishments in which they are located, all for a health purpose.
15	ROYAL SPANISH HUNTING FEDERATION (RFEC)	The RFec considers it essential for MAPA to work together with our organisation on the preparation and development of this project. As representatives of those affected, our collaboration is vital to ensure that the regulation of the basic standards for auxiliary game animals is balanced and technically feasible.	Partially accepted. The rules are drawn up by the Administration, and citizen participation is already governed by Article 26 (6) of Government Law 50/1997 of 27 November.
16	ANIMAL AND PLANT PROTECTION COMPANY IN MALAGA	All dogs, regardless of their function, are pet animals, as laid down in Law 8/2003 of 24 April of the same year on Animal Health in its definitions. Therefore, all facilities housing dogs, whether hunting, keeping, care, professional, pastoral or companion, must be regulated by the Royal Decree on Zoological Numbers of Pet Animals, promoted by the Ministry of Social Rights. What is more, in the case of municipal or protective kennels, which collect both pet dogs and hunting, keeping or grazing dogs, abandoned by their owners or collected on the street, we would find ourselves in a difficult situation. We therefore consider that establishments housing dogs of any kind or activity should not be included in the scope of the future Royal Decree on Traditional Zoological Numbers.	Not acceptable. As stated above, the future legislation must cover all the animal zoological centres to which Law 7/2023 of 28 March 2007 does not apply, since they are not covered by the Royal Decree on the zoological centres of pets currently being processed, in order to ensure the proper coherence of our legal system. Furthermore, this future Royal Decree is based on Law 8/2003

			of 24 April 2003 on animal health, and its regulation is essentially health (without prejudice to the fact that it will also cover the necessary aspects of animal welfare). In any event, a Royal Decree is approved by the Council of Ministers, and it is therefore irrelevant, for this purpose, whether the Department is the initiator of a regulation.
17	ARRECAL – ASSOCIATION OF SPANISH REGIONAL PACKS OF HUNTING AND FREEDOM	Regulations without prior technical consensus may lead to the unfair closure of many legalised hunting pounds; the impossibility of registering new analogous facilities or bureaucratic hurdles that are unmanageable on a sectoral basis.	It is accepted in the above sense that the rule is drafted by the administration, not necessarily always in agreement with the sectors involved, since it is sometimes necessary for the rule, following the momentum demanded by society, to innovate the legal system. However, it cannot be assumed that the standard will set requirements that are impossible to comply with or go beyond

			those currently applicable to hunting packs of hunting hounds or hunting hounds, beyond their necessary adaptation to current health (and animal welfare) priorities.
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ANNEX II

COMMENTS RECEIVED DURING THE HEARING AND PUBLIC INFORMATION AND CONSULTATION OF THE COMMUNITIES AND THE SECTOR ON THE DRAFT ROYAL DECREE LAYING DOWN BASIC RULES ON ANIMAL HEALTH, AUTHORISATION AND REGISTRATION OF TRADITIONAL ZOOLOGICAL CENTRES AND AMENDING VARIOUS RULES.

In general, clarification is provided regarding the various claims received in relation to certain animals (essentially) hunting dogs and sanctuaries.

It should be noted that these game animals (as well as animals used in specific activities) are excluded from the scope of Law 7/2023. For animal health purposes, on the other hand, all dogs are pets, but we would reiterate that, for the purposes of Law 8/2003 and EU legislation, this must be distinguished from animal welfare. Within this framework, the purpose of the Royal Decree is not to regulate strictly the welfare of animals, understood as the specific rule applicable to them in general, but to establish the animal health and welfare aspects of the facilities housing them. This is unrelated to the specific rules on animal welfare that apply to, for example, hunting dogs, for which purpose this rule does not mean that it can no longer be contrary to the intention of the legislature set out in Law 7/2023, which, we repeat, does not regulate this matter, but is limited to the hygiene and health and animal welfare requirements of the facilities that house them.

With regard to animal shelters (incorrectly cited in the claims as sanctuary, not only terminologically but also etymologically), there are no animal health reasons that justify specific or differentiated treatment for them, given that the rule is unrelated to social issues relating to their purpose or ethical aspects that can be cited in relation to it, being objective in the treatment and regulatory set-up of these facilities, given that the health implications of keeping animals in them do not vary according to the objectives of the same, and must be dealt with in a holistic manner within the 'One Health' approach. Without prejudice to this, the legislation already provides for certain specialties to the extent possible if a sick animal is detected in the animals, regulating the non-slaughter of the animals, but always considering first of all the main legal interest protected, which is health.

Part A. Entities having sent reports/observations

Autonomous Communities (7):

- Autonomous Community of Madrid. Directorate-General for Agriculture, Livestock and Food
- Galicia. Conselleria de Medio Rural (Ministry of Rural Affairs) (no comments)
- Balearic Islands. SGT Conselleria de Agricultura, Pesca y Medio Natural de Baleares (Regional Ministry of Agriculture, Fisheries and the Natural Environment of the Balearic Islands)
- Catalonia. Directorate-General for Agriculture and Rural Development
- Catalonia. Department of Territori, Habitatge i transició Ecològica
- Castile and Leon. Regional Ministry of Agriculture, Livestock and Rural Development
- Aragon. Planning, Traceability and Welfare Service

Ministries (2):

- Ministry of Health (no comments)
- Ministry for the green transition and the demographic challenge (MITECO)

Sectoral organisations (1):

- Agri-food cooperatives F79366878

Other associations or bodies (32):

- National Association for the Defence of Animals (ANDA)
- AnimaNaturalis International G67350462 Foundation

- ADDA ASSOCIATION DEFENCE OF ANIMAL RIGHTS G58809104
- Artemisan Foundation C.I.F. G-13598545
- Madrid Institute for Rural, Agricultural and Food Research and Development (IMIDRA)
- Live the Life Foundation 867287317
- Animal Guardians Foundation Spain G-19458280
- GalgoPodencoPlatform 61255599
- Official Chamber of Veterinary Surgeons of the Region of Murcia Q3071001F
- Official College of Woodland Engineers Q2871006I
- Barcelona Official Chamber of Veterinary Surgeons Q0871001D
- G79555850 GUIDE DOG ELEVEN FOUNDATION
- B67103978 ANIMAL ADVICE AND ACTION FOUNDATION
- Iberian Association of Zoos and Aquaria (AIZA) G58692435
- Confederación Empresarial Veterinaria Española (CEVE) G57923971
- Madrid Official Veterinary College Q2871002H
- ROYAL SPANISH HUNTING FEDERATION Q2878011B
- GENERAL COUNCIL OF SPANISH VETERINARY PROFESSIONAL ASSOCIATIONS Q2871003F
- Association of Legal Centres for Breeding and Responsible Care (ASCELCCRE)
- Fédération Extrêmeña de Caza G06065213
- INTERCIDS, LEGAL OPERATORS FOR G66939158 ANIMALS
- Federation of Animal Protection and Defence Associations of the Community of Madrid (FAPAM) V84661164
- Animal Justice G82892233
- HAIEKIN Association, Towards Animal Conscience G09766791
- My friends the G86761889 pigeons
- National Association of Pork Producers (ANPROGAPOR) G287665666
- Animal Shelter Standards Foundation (FASS) G10564870
- Andalusian Council of Official Veterinary Colleges
- Animal Compassion Sanctuary Association
- Animal Protective Association "Saving Baby" CIF G-86945136
- Gaia G55274989 Sanctuary Foundation
- Asociación de Rehalas Regionales Españolas, Caza y Libertad [Association of Spanish Regional Rehales, Hunting and Freedom] (ARRECAL) G-42179648

Others (29):

Susan Bultitude, Münchner Galgomarsch, Amanda van Gaalen, Hermien van der Weiden, Jan Morren, Ragnhild de Hoog, Maria Paula Busto, Chita Bos, Marta Esteban Miñano, Adriana van den Boogert, Marloes Nieuwenhuise, Veerle Vanden Bussche, Geertruida Visser, Jimmy Grosemans, Britt Donkers, Stichting Greyhounds in Nood Nederland, Mirella Jarijch, Petra van de Logt, Kristien Van de Moortel, Suan

Part B – General comments

1. COMMUNITY OF MADRID:

- a. In general terms, it should be noted that the authorisation of zoological centres, as well as any activity, in accordance with Law 7/1985 on Local Government, is a municipal competence. Providing in the Royal Decree for the authorisation of zoological nuclei that are located on rustic soil may result in zoological nuclei being authorised in places where it is not permitted in accordance with urban planning legislation and regulations of the local administration. Zoological centres must be approved by the municipal council and subsequently included in the register, subject to any requirements that may apply. We do not agree that the authorisation of Zoological Numbers falls within the competence of the Autonomous Communities, in accordance with Article 36 of Law 8/2003 of 24 April 2003 on animal health, regardless of the fact that they also require a municipal licence, but this is not a matter for the legal basis of the legislation.
- b. There is no need to publish two Royal Decrees with competence in zoological areas (traditional zoological centres and zoological centres for pets). These two Royal Decrees could lead to regulatory duplication and unnecessary differences in interpretation for operators, citizens and the competent authorities. This situation could negatively affect the principles of legal certainty, regulatory coherence and administrative efficiency. In addition, these two royal decrees could lead to differences in treatment between equivalent scenarios or to overlapping competences. It would be more appropriate for the regulatory matter relating to zoological centres to be integrated into a single Royal Decree with a homogeneous framework. We do not agree with this proposal, which specifically regulates zoological centres for animals other than pets. There is therefore no duplication or difference in treatment (each species has its own regulation, as is the case in the livestock sectors, for example). Since the addressees are different, a different set of rules makes more sense.

2. COMMENT MADE BY: Amanda van Gaalen, Hermien van der Weiden, Jan Morren, Ragnhild de Hoog, Viva la Vida Foundation, Maria Paula Busto, Chita Bos, Adriana van den Boogert, GalgoPodencoPlatform, Marloes Nieuwenhuise, Veerle Vanden Bussche, Geertruida Visser, Jimmy Grosemans, Britt Donkers, Stichting Greyhounds in Nood Nederland, Mirella Jarijch, Petra van de Logt, Kristien Van de Moortel, Suan PLOEGMAKERS, Kenny Nieuwendijk – EGPAC, Antonia Verhaegh, Comité Anti Stierenvechten (CAS International) 8030.15.082.B01, Estefanía Pampín Zuidmeer, HABs van Rijsing, CG.Holland

- a. First. Unification of the regime applicable to all pet animals in a single regulatory development. The regulation of all zoological centres of pets, where pets are kept, including dogs and ferrets regardless of their use, is required to be incorporated into a single law, avoiding the current division between ministries that creates legal uncertainty, duplication and possible interpretative contradictions. This legislation will be that developed by the Ministry of Social Rights, Consumer Affairs and Agenda 2030. Any reference to pets should be deleted from the draft Royal Decree on traditional zoological centres. We do not share the view that Law 7/2023 does not apply to certain animals (essentially game animals and animals kept for farming purposes), which,

because of this legal clarification, are not companion animals; that regulatory circumstance, relating to animal welfare, cannot be confused with the fact that, for the purposes of Law 8/20023, all dogs are pets. The regulation is carried out by means of a royal decree, approved by the Council of Ministers, and is not a rule specific to one ministry or another.

- b. Secondly. Improvement of the text as regards animal shelters (Sanctuaries). The special concept of animal sanctuaries should be recognised without equating them with a productive activity, respecting their social function and adapting maximum capacities to the individual characteristics of each animal. The proposed rules are sufficient for the purposes set out above and there is no point in treating them differently.

The capacity of the sanctuaries to modulate the identification and traceability systems, as well as the treatments of the different diseases, should be adjusted as much as possible to suit the social and awareness-raising work of these entities. We would stress that the regulation is sufficient, regardless of the fact that it does not specify what this adjustment refers to (more or less space?), and that there is already specific regulation in the event of positive results in shelters in this draft royal decree.

3. **COMMENT MADE BY:** Dimitri Nagib Defranc Cevallos: New articles to be added:

- a. New Article: Scientific Population Management and Biosafety: Refugees/Sanctuaries or comparable centres may be centres for research and population management under the scientific parameters of consensus and the criteria of animal sentience. They may also be centres dedicated to analysing the behaviour of species. Relations should be established with institutions and research centres in order to improve knowledge of the species present in each centre and their environment and of the containment of certain species during their natural life. This investigation is specific to that free from mistreatment, slaughter and animal suffering.

The Autonomous Community must be notified when any means of investigation or population management is initiated. If this investigation or management is requested by the Autonomous Community, the latter must initiate this report on its own initiative and cover all the expenditure arising from this activity.

We do not agree, this is a matter that falls outside the scope of the Royal Decree and, in any event, falls within the scope of the regulatory development of the Autonomous Communities, regardless of the fact that the investigation is already regulated by Royal Decree 53/2013.

- b. New Article: Official Confiscation Infrastructure: An article making it compulsory to facilitate the authorisation of 'Refugios/Santuarios' or centres that can be approved as official and safe destinations for the location of animals seized or moved by illegal trafficking, thus preventing their slaughter due to a lack of space. In addition, the authorities will have to include these figures in their budgets.

In the event of confiscation, the authorities must cover the costs of the refugee animals.

We do not agree, again this is a matter that falls outside the scope of the Royal Decree and which, in any case, falls within the scope of the regulatory development of the Autonomous Communities.

- c. New Article: Social Function, Ecosystem Services and Funding: On sustainability. It should establish that the administrations (Ministry, Provincial Councils, Municipal Councils) will provide direct funding lines to the Shelters/Santuaries for the services

provided (recovery of fauna, education, fire prevention, participation in the Ecological Restoration). This will ensure that these non-profit entities can comply with the high health standards of the new law. We do not agree, a promotion policy (aid) is the responsibility of each administration and cannot be imposed in a basic rule.

- d. New Article: Ease of management. The public authorities shall have the obligation and duty to facilitate, assist and ensure the viability, welfare and good conditions of refugees/sanctuaries or comparable centres, such as social and physical structures and all the animals they inhabit, making every effort to promote their creation and the maintenance, survival and control and population containment of those already in existence. In addition, it should always be borne in mind that they are not centres of exploitation or personal profit, but rather profit, social, health and environmental initiatives and a source of scientific knowledge of the welfare of nature and animals. Regulations must be aimed at preserving the welfare of animals, the community and the environment, and must not under any circumstances constitute a barrier to their proper creation and management. We do not understand the observation, the proposed regulation already serves these purposes.

- 4. **CASTILE AND LEON. REGIONAL MINISTRY OF AGRICULTURE, LIVESTOCK AND RURAL DEVELOPMENT.** In view of the version 'PROYECTO DE REAL DECRETO XX/2026, DE XX DE XXX, ESTABLISHING BASIC RULES FOR ORDENATION OF COMPANY ANIMALS ZONES' in public information up to 20 March 2026, there is an overlap between the two rules, by including the rule on pet zoos in all pets, without excluding pets in traditional zoological centres, and by considering as types of establishments 'Centres for permanent housing of dogs', and the protection centres housing pets that previously had the status of production animals.

For this reason, and because of the difficult separation between activities such as the rearing of falconry birds and their use in ZACA activities, that of rehala and in turn the marketing of rehala specimens, etc., **it is proposed, in order to facilitate the registration of these activities for both the owner of the zoo and the competent authority in each Autonomous Community for the registration of zoos, to merge both standards into a single register of establishments for captive animals other than livestock establishments, so that both Ministries are proposing the standard.**

This overlap has been identified and will be resolved in such a way that it is corrected in the final texts of both Royal Decrees.

- 5. **Comment BY** Maria Angeles Díaz Rodelgo:

- a) Breach of the principle of equality and regulatory consistency: There is no objective and reasonable justification for treating dogs used in hunting activities differently from other animals of the same species, as is apparent from the provisions of the project as a whole. This is contrary to the recognition of animals as sentient beings laid down in Law 7/2023, as well as to the principle of equality enshrined in Article 14 of the Spanish Constitution. We do not agree that these animals do not fall within the scope of Law 7/2023, although they do fall within the scope of Law 8/20023, so that the draft Royal Decree specifically fills this regulatory gap, since there are currently no specific animal welfare rules for the facilities in which these dogs are located.
- b) The project has regulatory gaps that create legal uncertainty and hinder its effective implementation, in contravention of the principles of good regulation. We do not agree with this: the standard is complete in terms of the content that a basic standard should have, which should leave the necessary scope for the regulatory development of the Autonomous Communities.

6. OFFICIAL CHAMBER OF VETERINARY SURGEONS OF MADRID:

- a) In general terms, the first thing **to be taken from this draft Royal Decree** is that it involves considering dogs used in **specific activities when their number exceeds 10 specimens**, as dogs to be registered in the General Register of Livestock Holdings (REGA) and Traditional Zoological Numbers (NNZZT), which will entail a substantial difference in relation to the care to be given to dogs considered to be pet animals covered by Law 7/2023 of 28 March on the protection of the rights and welfare of animals and in respect of which the law stated that they would be protected by the relevant European, State and Autonomous Community legislation in force, dogs, the possession of which, as stated in its preamble, should entail a responsibility commensurate with the care to be given to a sentient animal (different from one thing) and which, when integrated into this Royal Decree, are again discriminated against other dogs. We do not agree, there is no discrimination, but rather different rules depending on the destination of the animals and the rules applicable to them. A royal decree cannot be contrary to a law.
- b) In addition, **they are subject to handling and management conditions, such as limiting visits to what is strictly necessary, in Article 9, which, from the point of view of dog ethology, are insufficient to cover their physical needs and preserve their emotional balance.** It is not shared, animal welfare conditions are adequate, and health risks, especially zoonoses, are limited.
- c) We also **welcome the fact that it is mandatory to designate a veterinarian responsible in all zoological centres, but this needs to be made more specific, as the text lacks a clear definition of their roles and responsibilities in terms of health control, biosafety, animal welfare, traceability and health plans and protocols.** It is also important to clarify important issues such as access to veterinary medical supplies, as medicinal products should only be accessible to the veterinarian and to anyone indicated by the veterinarian. There must also be accredited and ongoing training provided or validated by veterinarians for staff working in the centres. These aspects are extraneous to the legislation and are specific to the regulation of the profession or to the prescription and use of veterinary medicinal products.

7. GENERAL COUNCIL OF SPANISH VETERINARY PROFESSIONAL ASSOCIATIONS:

- a. Having reviewed the draft Royal Decree laying down the basic rules for the organisation of zoological centres for pet animals, currently being processed by the Ministry of Social Rights, Consumer Affairs and Agenda 2030 at the same time as this draft, **we consider that the coexistence of the two rules could lead to potentially overlapping areas of application or regulatory gaps. It will be corrected in the final texts.**
- b. Some aspects that should be reviewed are: **This** project uses as a reference Commission Implementing Regulation (EU) 2018/1882 to delineate traditional NNZZ species and Annex I of Regulation (EU) 2016/429 to exclude some species as being pet animals, however, for pet animals it is not clearly determined which species are included in that category, it being understood that this will be subject to the approval of the corresponding positive list of pet animals. **This difference in criteria may create uncertainty in the classification of certain animals and establishments, and may lead to regulatory gaps for those animals that are not clearly included in either of the two sets of rules, even though their holding is currently legal. It is**

indeed an aspect that is conditional on the approval of the positive list of pet animals, although it is an aspect that needs to be addressed in the draft Royal Decree on zoological centres for pet animals, not in this Royal Decree, bearing in mind, in any event, that such animals initially fall within the scope of Law 7/2023.

- c. There are **establishments that house both pets and animals of non-productive production species**. The lack of clear criteria for its classification can lead to **interpretative conflicts** and allow it to depend on the decision of the holder (whether to register the animal as a pet or not), creating inequalities in the application of health requirements and animal welfare. **It is** therefore considered appropriate to **expressly provide for the possibility of mixed zoological centres, allowing them to be included in a single register, ensuring compliance with the legislation applicable to each species**, without creating an unnecessary increase in the administrative burden, avoiding, inter alia, duplication of registration, administrative management or inspections. The legislation already provides for the existence of a single NZT, although it will have different species, and if it is the same location and the pets and production animals coincide, in a sanctuary, for example, it will have two registers, one by this Royal Decree and the other by the Royal Decree of Zoological Numbers of Pet Animals. And two REGA codes, one for production and the other for NZT, may be present in the same location (and within the only zootechnical classification as NZT, several codes according to the number of activities corresponding to the types of NZT provided for in the Royal Decree).
- d. In conclusion, **it is considered necessary to strengthen the regulatory coordination between the two regulatory texts, in order to ensure their consistency and avoid problems of interpretation in their application**. It could also be considered whether the two projects should be harmonised or integrated into a common regulatory framework. It is considered more appropriate to keep the separation in two regulatory drafts.

8. ASELCRE

- a. To **eliminate rigid segmentation between zoological nuclei of pets and other nuclei**. Not shared.
- b. **That any interpretation whereby the mere assertion of a specific hunting, work or activity purpose makes it possible to remove dogs, cats or ferrets, or the facilities where they are bred, housed, collected, kept or marketed, from the regime specific to the zoological centres of pet animals is expressly excluded**, except and only in so far as strictly linked to the actual, verifiable and legally circumscribed exercise of the specific applicable sectoral activity. The rule is clear.
- c. That, in the event of competition between MAPA and DGDA, **a unitary or coordinated scheme for the supervision of zoological centres be chosen**. The executive competence lies with the Autonomous Communities, not with the General State Administration.
- d. **To make available to this party the full file of the initiative and MAIN**, including its successive versions and annexes, with identification of the procedures followed, reports issued and justification of the regulatory choices made. MAIN has been made public.
- e. That a formal qualified sectoral hearing **be opened with the effective participation of ASCELCRE and other entities representing the professional sector concerned**. This is not a procedure provided for in Law 50/1997 and is not applicable.
- f. That **the MAIN incorporate an express and sufficient assessment of the impact of the regulation on the professional sector**, self-employed workers, effective competition between operators and real animal welfare, justifying why there are no

categories, thresholds or qualifications with lower requirements that distort the ordinary system of authorisations, licences, veterinary control and inspection. The rule is proportionate.

9. EXTREMADURA HUNTING FEDERATION

- a. Request for a clarification **note to MAPA on the RD of the Traditional Zoological Numbers; to show unequivocally that the establishments listed in the draft Royal Decree on traditional centres are the ONLY applicable to hunting dogs, auxiliary hunting animals** and all those listed in the Royal Decree itself. The rule is clear, no interpretative notes are needed.
- b. Request to **include feline colonies within the scope of the Royal Decree**, since in the draft Royal Decree xx/2026 of xx xxx laying down basic rules for the organisation of the zoological centres for pet animals of the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda they are excluded and pose a health and environmental risk which must not be ignored and which must be regulated through a zoological centre under the same conditions as any other activity, these conditions being adapted, only where necessary, to the specific characteristics of this type of group of animals, in which there is a concentration of animals, with the aggravating factor of the extraordinary health and environmental risk of this type of group. These colonies and animals are not covered by the legislation, they are regulated by Law 7/2023 and, for the purposes of Law 8/2003, they are pet animals.

10. **MITECO:** Section V of the MAIN states that 'The mandatory processing of this project will involve consultation with the Autonomous Communities and the cities of Ceuta and Melilla, and sector entities, as well as the public hearing and information required under Article 105 (a) of the Spanish Constitution, which must be carried out via the department's web portal in accordance with Article 26 (6) of Government Law 50/1997 of 27 November. Annex II to this report shall contain a summary of the arguments received and the opinion of this Ministry in this regard.' However, the potential claims of the Autonomous Communities are not **yet included in the file. They** will be available after the end of the public consultation.

11. ANDALUSIAN COUNCIL OF OFFICIAL CHAMBERS OF VETERINARY SURGEONS:

- a. It is important to note that two separate legislative drafts concerning the NNZZ, promoted by different ministerial departments, have been submitted to public information at the same time. The coexistence of the two draft regulations, which regulate closely related aspects of the NNZZ, **highlights the need to ensure proper regulatory coordination, avoiding possible overlaps, contradictions or regulatory fragmentations that could create legal uncertainty for operators and difficulties in the practical application of the rule. It has** already been explained that there are no overlaps, other than that relating to certain dogs, which will be corrected.
- b. It is considered necessary for the standard to establish a **minimum hygienic and health control protocol applicable to NNZZ**, including standardised procedures for cleaning and disinfection, waste management and disposal, pest control, biosecurity measures and the prevention of zoonoses, as well as compliance with minimum animal welfare criteria in accordance with the legislation in force on animal health and protection. It is a specific aspect of regulatory development or implementation by the Autonomous Communities.
- c. It is considered that the draft should **regulate in more detail the position of the veterinarian responsible for the zoo and the minimum content of the centre's health plan**, which expressly includes, as mandatory content, hygiene, biosecurity and

health prevention measures aimed at reducing the need for the use of these medicines. This corresponds to the regulatory development of the Autonomous Communities.

12. ARRECAL

- a. There is an abuse of the reference to European regulations, other regulations and the actual numbering of the articles of the draft, which means that it is very difficult to understand the content of the legislation. We do not agree, it is a common regulatory technique, which prevents the text from being very broad (and therefore more difficult for citizens to understand).

13. MINISTRY OF SOCIAL RIGHTS, CONSUMER AFFAIRS AND THE 2030 AGENDA.

ALLEGATION	Comments made by: Comment	SGHAT assessment
General	The fact that certain pet animals do not fall within the scope of Law 7/2023 of 28 March 2007 is not a justification for including them in this project, given that other supranational regulations (specifically the Regulation on the welfare of dogs and cats and their traceability, as well as the European Convention on the Protection of Pet Animals, already mentioned) and regulations at Autonomous Community level (all Autonomous Communities except La Rioja) – which also articulate the body of national legislation – do include and protect them.	Animals not included in that law must specifically have a rule that protects the legal regime of animal health and welfare applicable to the establishments that house them. In this regard, the animal health legislation is applicable to all species and animals, but, with regard to those excluded from Lye 7/2023, if they are not of production species, they are also covered by Law 32/2007, with the result that they are in a regulatory limbo at national level, such as a kind of <i>tertium genus</i> , without prejudice to EU regulations on pet animals (dogs, cats and ferrets only).
General	it is requested that all pet animals considered as such in both Law 7/2023 of 28 March and Law 8/2003 of 24 April on animal health be regulated in a single royal decree, in a similar way to what has been done in the previous legislation related to the subject matter covered by the regulation, specifically the draft royal decree on the identification of pet animals.	To be assessed by the DDGG. Without prejudice to this, this Ministry is competent to regulate all aspects of animal health in a possible future Royal Decree covering all these categories of animals, and also with regard to animal welfare considerations not included in Law 7/2023, in accordance with Article 6 (1) (a), (b), (f) and (o) of Royal Decree 717/2024 of 23 July.

Preamble	Drafting remarks	They are not accepted for the same reasons.
Article 1	Include emergency plans. Consider space, and provide for a transitional period for existing establishments. In paragraph 3: — Point (f) should be amended as follows: Zoological centres of pets regulated by legislation specific — Point (g) should be deleted. In any event, it is not clear to which specific legislation the authorisation relates. Point (h) excludes from the Royal Decree the keeping of animals for non-commercial purposes in private homes. Since private homes are excluded from the definition of the NZT, it is not clear what requirements apply to private homes that do have animals for commercial purposes. In paragraph 4, it is suggested to include animal welfare as another scope, as it is an area of category similar to those identified in that paragraph, such as animal health or the environment.	It is not necessary, however, to consider this aspect in the development of legislation. With regard to space, this corresponds to the development of legislation, and transitional arrangements for size are already provided for in the Second Transitional Provision. It is unnecessary. We do not accept this, as the legislation may be regional, local, etc. The rules shall apply according to the species. Finding accepted.
Article 2.	Definitions (d), (f) and (h) should be deleted as they refer to pet animals. Point (e) defines 'auxiliary game animal'; however, this category is not used throughout the articles and it is therefore suggested to delete this definition. If kept, pet animals should be excluded.	It is not accepted for the reasons set out above. The draft Royal Decree on the identification of pet animals will need to be amended. This definition is needed, for example for game ferrets, to distinguish them from pet ferrets. The standard already excludes pet NNZZ.
Article 3.	There is an overlap between the establishments referred to in points (f) and (i), since the birds referred to in point (f) may participate in those referred to in	Each area is clearly defined.

	point (i). Point (h) should be deleted. With regard to point (i), the rest of the collections of animals that do not form part of the list of domestic pet species or the positive list of pet animals, and which are regulated in this Royal Decree, should be included, and not refer exclusively to birds.	It is not accepted, for the reasons set out above, from the scope of application. Not accepted, not all private collections of all species are intended to be regulated in the standard.
Article 5.	It is considered that the confined establishment referred to in paragraph 2 should be a type of classification in the same way as quarantine centres, given that both are types of establishments listed in Article 1(8) of Commission Delegated Regulation (EU) 2019/2035 of 28 June.	Not accepted, not required.
Article 7.	Section 5 indicates, as aspects to be taken into account, both behavioural needs and ethological needs, both concepts being very similar. It is suggested to delete the reference to “ethological needs”. The second subparagraph of paragraph 14 gives the competent authority the power to waive certain conditions where it considers that their application is not possible. As it is not a specific paragraph, it is not clear whether it only refers to paragraph 14 or to the whole article. In any event, exempting certain requirements as considered by the competent authority may undermine the legal certainty of the draft legislation as a whole, as it makes it difficult for operators to know the extent of the obligations they have to comply with, and de facto prevents the establishment of harmonised criteria at national level, given that different competent authorities may have different criteria. In this regard, it is considered necessary to specify the exceptions for each of the types of NNZZT.	Finding accepted. This power should be left to the competent authority, as, for example, is already provided for in the avian influenza legislation.
Article 8.	The second subparagraph of paragraph 3 should specify the exceptions to the register, for the reasons already set out in the commentary on the second subparagraph of paragraph 14.	It is not accepted, the basic rule must leave the necessary room for manoeuvre to the competent authority, and the cases are specified in a limited manner.
Article 11.	The content of points (a), (b), (c), (d) and (e) is already provided for in Article 10 of Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, to which reference is already made in Article 4(1) of this Royal Decree, and we therefore suggest that it be deleted. In paragraph 3 on euthanasia, reference is made to the legislation in force on killing or euthanasia; since euthanasia and killing are different concepts, the wording of this paragraph is unclear.	It is preferable to keep it, it clarifies the obligations. Clarification.
Article 12.	Paragraph 1 should be amended as follows:	Accepted

	'1. The owners of the animals and, in addition, the owners of NNZZT, must comply with the animal identification obligations laid down in Royal Decree 787/2023 of 17 October 2007 laying down provisions to regulate the system for the traceability, identification and registration of certain species of kept terrestrial animals; or in the applicable legislation, in accordance with the species maintained. However, the competent authority may establish the criteria for identifying animals of unknown origin entering NNZZT referred to in Article 3 (d).' Paragraph 4 should be deleted. The requirements for the identification of pet animals are already laid down in the draft Royal Decree on the identification of pet animals notified by that ministry on 22/12/2025. As regards paragraph 5, the census declaration is an obligation of the holder of the NZT and does not correspond to identification, it is therefore suggested to include it as a paragraph of Article 4.	Partially accepted, it is specified that the obligation refers to the dogs and ferrets included in the Royal Decree alone, and with regard to the rest of the provision, it establishes the relationship between the animal and its destination, having regard to the purpose of the holding. It is not accepted, as it is considered appropriate to include it in Article 12, since the census is linked to animal identification.
Article 13.	Point (c) of paragraph 1 should be deleted as it refers to pet animals.	It is not accepted, for the reasons given with regard to the scope.
Article 15.	Paragraph 2 provides for the possibility for the competent authority to waive the need for authorisation, based on a health risk assessment. Once again, the derogations provided for in this Royal Decree are applied on the basis of criteria of a given competent authority, with the consequent legal uncertainty and risk of a lack of harmonisation of obligations and criteria throughout the national territory. The fifth paragraph of this section also states that any changes to the information given in the declaration must be reported, without there being any minimum content of the declaration. The minimum content of the declaration should therefore be included in the draft.	It is not accepted, the competent authority must have sufficient scope for application, and provision must be made for its delimitation (health risk assessment). Not accepted, any change must be communicated and the record changed, the data required are the minimum necessary.
DT 2A	The references to maximum capacities are already specified in the first transitional provision and should therefore be deleted.	Not accepted, transitional one is for authorisations and transitional one is also for distances.
DF 1A	The wording of paragraph four amending Annex III should be amended to remove establishments housing animals used for specific sporting and	We do not accept the above with regard to the scope of application.

	professional activities.	
DF 2A.	Given that the regulation of zoological centres for pets will be laid down in a specific regulation, it should be clarified within the scope of Royal Decree 1547/2004 of 25 June laying down rules for the organisation of rabbit farms. Therefore, in Article 1 (3) of the, a new paragraph (f) should be added, with the following content: “(f) zoological centres governed by Royal Decree XX/2026 of XX DE XXX laying down basic rules for the organisation of zoological centres for pet animals.”	Not accepted, these are production animals, and will depend on the future list of pet animals.
DF 6A	A new paragraph (d) should be inserted in Article 1(3) of which reads as follows: “(f) zoological centres governed by Royal Decree XX/2026 of XX DE XXX laying down basic rules for the organisation of zoological centres for pet animals.”	Not acceptable. Porcine animals are always production animals.
DF 7A.	A new paragraph should be included: “(f) zoological centres governed by Royal Decree XX/2026 of XX DE XXX laying down basic rules for the organisation of zoological centres for pet animals.”	Not acceptable. Poultry are always productive animals.
DF 8A.	Since the regulation of the zoological centres of pet animals will be included in a specific regulation, it is necessary to include a reference to the zoological centres of pet animals in all the amended sections.	It is not accepted for the reasons already set out with regard to the scope.
DF 9A	Since the regulation of zoological centres for pet animals provided for includes animal protection centres keeping pet animals that had previously had the status of production animals, the reference to such centres should be included in Article 1 (2a).	It is not accepted for the reasons already set out with regard to the scope.
DF 10A	Article 149 (1) should be added to the title of competence. 23.a because the project refers to environmental protection and this is reflected in the MAIN.	Finding accepted.
Annex I	The reference to paragraph 1 (h) of Article 3 and the reference to the number of dogs in paragraph 12 should be deleted.	It is not accepted for the reasons already set out with regard to the scope.
Annex III	In paragraph 10 (b), “where appropriate” should be added, since in the case of recovery centres wild animals may originate from the wild and not from a previous zoological nucleus.	Finding accepted.
Others	It is recommended to split paragraph 16 of the narrative part into two paragraphs for better understanding. In paragraph 20 of the explanatory part, the word ‘Cities’ should be in lower case.	Not required. Finding accepted. Finding accepted.

	The last paragraph of the explanatory part should refer to the year 2026. In Article 11(3), the acronym NNZZT should be used. In the first final provision, the amendment to Annex IV is paragraph five, not four. In accordance with Section 29 of the Regulatory Technical Guidelines, approved by Agreement of the Council of Ministers of 22 July 2005, the wording of the Articles should be without bold.	The use of acronyms has been corrected. Corrected. Corrected.
MAIN	The need to include all pets in a single royal decree, in the interests of clarity and legal consistency with the provisions of national and Community legislation on the protection of pets and animal health, and the term 'traditional zoological centres' should be reserved for animals other than pets which are not used for agricultural production. With regard to alternatives, it is suggested that the reference to both <i>soft law</i> alternatives and the mandatory nature of the legislation be deleted, since not all the requirements included in the draft can be subject to penalties, specifically non-compliances occurring in relation to the animal welfare of establishments that do not have a commercial or profit-making purpose, as they fall outside the scope of Law 32/2007 of 7 November. With regard to the principles of good regulation, as explained throughout the report, we consider that they do not comply with the principles of legal certainty, transparency and efficiency, since the content of the project is not consistent with what is laid down in EU and national legislation regarding the status of pet animal and, therefore, they are not regulated in the same legal instrument – as indicated by the Ministry of Agriculture, Fisheries and Food – i.e. the zoological centres of pet animals. Furthermore, the reference to the annual regulatory plan should cover 2026.	It is not accepted, for the reasons already set out in the scope. We do not accept this. The mandatory nature of administrative law is inherent in its status as <i>jus cogens</i>, as opposed to the operative nature of civil law, and not to the possibility of imposing administrative penalties, which, incidentally, are permitted under Law 8/2003 of 24 April 2003. On the other hand, the absence of legislation imposing penalties on animal welfare for hunting dogs is not corrected by including them in one or other Royal Decree, as it requires legislation with the status of law. It is not accepted, for the reasons already set out in the scope, that the rule is clear, provides legal certainty for citizens' action, and is effective and efficient, even in terms of making it easier to understand and reducing administrative burdens. Finding accepted.

	Therefore, it is considered essential to establish space requirements at least for all zoological nuclei housing dogs. With regard to the description of the procedure, it is justified that it is not necessary to be subject to the procedure for the provision of information in the field of technical standards and regulations and of regulations on information society services, governed by Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015; however, this procedure is mentioned in the explanatory part of the text.	It is not accepted, it is not specific to MAIN and corresponds to the regulatory development of the Autonomous Communities. The preamble is accepted and corrected.
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Part C. Comments on the draft Royal Decree laying down basic rules on animal health, the authorisation and registration of occupational zoological centres and amending them.

ALLEGATION	Comments made by:	Comment	SGHAT assessment
PREAMBLE	Susan Bultitude	I consider that hunting dogs are not tools and should be included in the group of all dogs and should be protected like other dogs.	All dogs are sentient beings, the regulation of the facilities hosting them, which derives from their applicable legal regime, is different.
	Susanne Steffen Galgomarsch Hamburg	First. Unification of the regime applicable to all pet animals in a single regulatory development. Secondly. Improvement of the text as regards animal shelters (Sanctuaries). The special concept of animal sanctuaries should be recognised without equating them with a productive activity, respecting their social function and adapting maximum capacities to the individual characteristics of each animal.	Not applicable, Law 7/2023 does not apply to certain animals (essentially game animals and animals kept for farming purposes), which, because of this legal clarification, are not pets; that regulatory circumstance, relating to animal welfare, cannot be confused with the fact that, for the purposes of Law 8/20023, all dogs are pets. With regard to shelters, the proposed rules are sufficient for

			the purposes set out above and there is no point in treating them differently.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	(Page 3, Paragraph 3): The words <i>'These limitations shall apply to the areas registered since the entry into force of this Royal Decree, but shall not apply to those already in existence at that time'</i> . It should read <i>'These limitations shall apply to all areas, both those registered since the entry into force of this Royal Decree and those already in existence at that time'</i> .	The rule cannot be applied retrospectively.
	THE COMMUNITY OF MADRID	Drafting proposal: <i>'It is important to note that these centres refer to those where there is no direct use of the animals' production, and therefore establishments such as school farms or zoos fall within their scope.'</i>	Finding accepted.
	THE COMMUNITY OF MADRID	For: <i>To this end, establishments defined as Traditional Zoological Numbers, as defined in this Royal Decree, must be part of and expressly included in the scope of Royal Decree 479/2004 of 26 March establishing and regulating the General Register of Livestock Holdings, as they are included in the definition of holding in Article 3.2 of Law 8/2023 of 24 April.</i> Drafting proposal: <i>'To this end, establishments defined as Traditional Zoological Numbers, as defined in this Royal Decree, shall be included for registration purposes only in Royal Decree 479/2004 of 26 March establishing and regulating the General Register of Livestock Holdings, as they are included in the definition in Article 3.2 of Law 8/2023 of 24 April.'</i>	It is not accepted, Royal Decree 479/2004 is not only for registration purposes, it has effects such as suspensions, the person responsible for sending the data, etc.
	Dimitri Nagib Defranc Cevallos	Proposal to amend the Preamble It is suggested to insert the following paragraphs in the Preamble of the draft to frame the rule under the recognition of animal sentience as laid down in Law 1774 of 2016 which establishes that animals are "sentient beings" and shall receive special protection against suffering and pain, in particular that caused directly or indirectly by humans. Furthermore, the Preamble (The Ethical Basis) of Law 7/2023 of 28 March 2007 in the text of the law begins by recognising that today's society has a special sensitivity towards animals, considering them as 'sentient living beings'. The social, ecological	Such a reference is unnecessary, and less so in relation to a rule of the Republic of Colombia.

		and preventive role of refugees, wildlife sanctuaries and comparable areas must also be incorporated into the general framework of the current climate emergency: <i>‘This legislation is based on the explicit recognition of animal sentience, adapting our legal system to the new social and environmental realities and to the sensitivity to the integral well-being of living beings without distinction of species. In this context, it is essential to move beyond the traditional framework of agriculture and livestock farming, in order to give a specific legal category to those animals, spaces and organisations that do not have a profit, company, food, industrial or commercial purpose and that are located in our environment due to anthropic action.</i> <i>Under the ‘One Health’ approach, the public benefit and ecosystem function of Shelters, Fauna Sanctuaries and Approvable Spaces are recognised. These sites are not mere zoological hubs, but key players in climate action and the rural agenda, acting as sentinels to environmental emergencies, protecting biodiversity such as the Natura 2000 network or natural parks, and are identified as allies in compliance with the European Nature Restoration Law (Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration). Published in the Official Journal of the European Union (OJEU) on 29 July 2024. The State must therefore promote their viability and provide them with a specialised health and training framework that guarantees the highest level of protection of ecosystems, centres or nuclei and the animals housed therein.’</i>	
	AIZA	Reference to Law 31/2003 The explanatory memorandum to the draft provides an overview of the applicable legislation on animal health and the organisation of establishments, citing various provisions of a general and sectoral nature. However, it does not contain an express reference to Law 31/2003 of 27 October 2007 on the conservation of wild fauna in zoos, which is directly applicable to one of the categories of	It is not necessary for Law 31/2003 to regulate other aspects, and precisely the animal health referred to in the second final provision of that law is developed in this project.

		establishments included in the scope of the project. In this regard, the proposed text itself expressly recognises, in Article 3 (1) (a), that 'establishments covered by Law 31/2003, including aquaria' are considered to be zoological centres for terrestrial animals. Similarly, the amendment to Annex III to Royal Decree 479/2004 specifically identifies 'zoological and aquarium parks' as a distinct category. Therefore, the absence of any reference to Law 31/2003 in the explanatory memorandum is inconsistent with the actual content of the draft, in so far as: — This is sector-specific legislation regulating zoos (including aquariums). — Its citation would help to clarify that the new regulation applies without prejudice to the sectoral legislation in force, strengthening legal certainty and avoiding possible interpretative doubts regarding the concurrence of regulatory regimes. It is therefore proposed to include an express reference to Law 31/2003 in the explanatory memorandum, in order to improve the internal coherence of the text and properly delineate the relationship between the two rules.	
	CEVE	The exclusion of hunting and work dogs from this draft Royal Decree would create a regulatory dysfunction that would be difficult to justify. The European proposal does not lay down, in general terms, an exclusion of these animals from the welfare framework when they enter into regulated breeding, keeping or marketing activities, and precisely aims to avoid regulatory divergences between Member States through uniform standards. Maintaining separate regulation at national level could lead to an uneven playing field between operators, as well as distorting the market, as animals originally reared for a specific purpose may subsequently move to another. Therefore, from the point of view of regulatory coherence, legal certainty and undistorted competition, it would be more appropriate to remove that exclusion and subject all dogs to a common welfare regime. Deletion of all references to permanent establishments housing pet animals (dogs, cats and ferrets) used in specific sporting and professional activities.	Hunting animals are excluded from Law 7/2023, and it is precisely in view of the current regulatory vacuum that there is a need for legislation regulating both the animal health and animal welfare requirements of the establishments in which they are kept.

	INTERCIDS	It does not comply with the legal concept of ‘pet animal’, the definition of which, laid down in legislation with the status of a law, cannot be modulated or restricted by regulatory legislation. This is all the more so since the regime applicable to the zoological centres of pets will already be fully regulated by a royal decree, the scope of which specifically covers such pets, according to their legal definition. We propose that the preamble be brought into line with the legal definition of pet animal laid down in Law 8/2003, eliminating any approach that makes it possible to differentiate animals of the same species according to their use or activity and ensuring that the future Royal Decree does not apply, under any circumstances, to pet animals, meaning, in accordance with the legal definition, all dogs, cats and ferrets, species that are automatically considered to be pet animals in themselves, regardless of their destination or use.	Hunting animals or livestock custody dogs are excluded from Law 7/2023, and it is precisely a rule that regulates both the animal health and animal welfare requirements of the establishments that house them, given the current regulatory vacuum. It is precisely a royal decree that cannot alter the will of the legislature in adopting Law 7/2023.
	HAIEKIN ASSOCIATION	It is contradictory that, while the preamble to the draft recognises the ‘intimate and indissoluble relationship between animal welfare and animal health’, the articles of the Royal Decree do not have any substantive obligations related to animal welfare. It is essential that this draft Royal Decree incorporate animal welfare standards aligned with the recognition of animals as sentient beings (Article 333a of the Civil Code), going beyond the strictly instrumental and sanitary approach.’	This is regulated in Article 9 of the draft.
	My friends Las Palomas	Remove traditional word from the title. They are nothing traditional.	It is terminological, it does not add anything to the project, apart from the fact that these are centres already regulated since 1975.
	Animal Shelter Standards Foundation	This draft: — artificially fragments the legal regime for dogs — introduces a double incompatible nature (company vs holding) — prioritises animal health over welfare — sets vague and exceptional welfare standards — creates legal uncertainty and risks of uneven protection And above all, it does not technically justify why a dog ceases to be	We have already explained the different legal regime applicable from the point of view of animal welfare, not animal health, for certain dogs, an aspect in which a royal decree cannot enter into or contradict the will

		a pet animal due to its use.”	of the legislator when adopting Law 7/2023.
Article 1. Aims and scope	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	Add under point 4: <i>In particular, in the case of hunting dogs as defined in Article 2 (2) (h) of this Royal Decree and kept in groups of less than 10 specimens, they shall comply with the provisions of Article 26, 27 (except point (d)) and 28 of Law 7/2023 on the Protection of the Rights and Welfare of Animals.</i>	It is not accepted, since it is stated that they do not fall within the scope of that law.
	Susan Bultitude	I believe hunting dogs should receive better treatment and conditions: not tied to short chains, have space and bed to sleep and make their needs away from where they sleep.	This is an aspect of regulatory development.
	AnimaNaturalis International Foundation	Article 1 (3) (g) excludes from the scope of the Royal Decree: <i>“facilities where dogs and ferrets used in specific professional and sporting activities are kept where the number of dogs and ferrets does not exceed 10”</i> This exclusion creates an unjustified regulatory vacuum. The use of dogs in hunting activities is an organised activity involving health, animal welfare and abandonment risks, which are widely documented in Spain. However, the project allows a potentially large number of facilities housing dogs used in these activities to fall outside the registration and control system foreseen for traditional zoological nuclei. Moreover, the text does not explicitly clarify which specific legal regime applies to these excluded installations, especially when it comes to pounds or installations located outside private homes. Setting a threshold of 10 animals, without explicit technical justification, also facilitates the artificial fragmentation of facilities in order to avoid administrative registration, which may compromise the effectiveness of the health control and traceability system. In the light of the above: review the exclusion laid down in Article 1 (3) (g); or, alternatively, that clear registration and control mechanisms are established for facilities housing dogs used for hunting activities, regardless of the number of animals.	It is not accepted for the reasons already set out on the list of these animals and Law 7/2023.
	THE COMMUNITY OF MADRID	Proposed wording of Article 1 (c): <i>“(c) Establish and regulate the Register of Traditional Zoological Numbers of Animals, as well as the minimum requirements and data for approval or, if required by the competent authority, for registration</i>	Authorisation is not required under Law 8/2003.

		<i>by means of a self-declaration of these establishments.”</i>	
	THE COMMUNITY OF MADRID	Article 1.3. Clarification is requested here as to where the veterinary hospitals will be registered. In addition to receiving pets, they may receive animals whose movement is subject to a guide of origin and health, and must therefore be registered.	This is an aspect of the legislative development of the Autonomous Communities.
	IMIDRA	In order to avoid divergent interpretations between Autonomous Communities, it might be appropriate to include in Article 1 (3), or in the Additional Provision, a text that specifically excludes from the scope of the Royal Decree Testage Centres, as well as Animal Selection and Reproduction Centres and other public or private genetic improvement centres officially registered as livestock holdings in the General Register of Livestock Holdings.	Not necessary, all holdings already registered in the REGA as producing are not covered by this Royal Decree.
	Marta Esteban Miñano, Animal Guardians Foundation Spain	The keeping in private homes and the operation of establishments keeping pets should be regulated by unified legislation capable of uniformly guaranteeing the principles of animal welfare recognised in the supranational, European and national framework. This requirement is particularly relevant with regard to dogs, cats and ferrets, which are considered to be pet animals under national law, irrespective of their destination, provenance or use, in accordance with Law 8/2003 of 24 April 2007. In addition, it is protected by the European Convention on the Protection of Pet Animals and by the European proposal for a regulation on the welfare and traceability of dogs and cats, which aims to establish common standards for the breeding, keeping and placing on the market of these animals in the EU. In this context, the exclusion of hunting and work dogs from this draft Royal Decree would create a regulatory dysfunction that would be difficult to justify. The European proposal does not lay down, in general terms, an exclusion of these animals from the welfare framework when they enter into regulated breeding, keeping or marketing activities, and precisely aims to avoid regulatory divergences between Member States through uniform standards. Maintaining separate regulation at national level could lead to an uneven playing field between operators, as well as distorting the market, as animals originally reared for a specific purpose may subsequently move to another. Therefore, from the point of view of	It is not accepted for the reasons set out above.

		regulatory coherence, legal certainty and undistorted competition, it would be more appropriate to remove that exclusion and subject all dogs to a common welfare regime. Proposed amendment Addition of two new paragraphs to point 3 to read as follows: g) The keeping of pets in private homes, which shall be governed by its specific rules. h) Zoological cores for pets.	
	Dimitri Nagib Defranc Cevallos	Add 1.f. “Create the framework to fit the reality in which the concept of refugees, sanctuaries and homologable figures are consolidated, and recognise, finance and facilitate their ecosystem and animal welfare work.”	Funding for shelters does not contribute at all and is alien to the legislation.
	Barcelona Chamber of Veterinary Surgeons	ARTICLE 1 ON THE SCOPE (3) (G) ON THE EXCLUSION FROM THE APPLICATION TO FACILITIES HOUSING DOGS AND FERRETS USED IN PROFESSIONAL AND SPORTING ACTIVITIES. <i>The purpose of this project is to establish prevention rules to minimise risks to the health of animals, humans and the environment, as well as to ensure animal welfare in certain groups other than livestock and companion animals not regulated by Law 7/2023 of 28 March 2007 on the protection of animal rights and welfare.</i> <i>In other words, it regulates the conditions for keeping, among other animals, dogs and ferrets used in sporting and professional activities, which are excluded by Article 1 (3) (e) of that Law.</i> <i>However, Article 1 (3) (g) of the draft also excludes these facilities from its scope when they house fewer than ten dogs or ferrets.</i> <i>We consider this exclusion to be contrary to the above-mentioned purposes, especially in the case of animals used in hunting activities</i>	It is not accepted for the reasons set out above.

		<i>due to the associated risks, as they are in direct contact with multiple wild game species.</i> <i>In addition, those using these animals in such activities must prove that they meet the animal welfare and health requirements and that they have the precise knowledge set out in this project.</i> <i>The future legislation should include all groups of animals or zoological centres to which Law 7/2023 of 28 March 2007 does not apply.</i> Proposal: delete the exclusion in Article 1 (3) (g): <i>(g) the premises where dogs and ferrets used in specific professional and sporting activities are kept when their number does not exceed 10 5 specimens in the same location, except where their authorisation is required by specific regulations or, in the case of dogs, unless they are part of a packet, pick-up or jaury.</i>	
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	<i>The keeping in private homes and the operation of establishments keeping pets should be regulated by unified legislation capable of uniformly guaranteeing the principles of animal welfare recognised in the supranational, European and national framework. This requirement is particularly relevant with regard to dogs, cats and ferrets, which are considered to be pet animals under national law, irrespective of their destination, provenance or use, in accordance with Law 8/2003 of 24 April 2007. In addition, it is protected by the European Convention on the Protection of Pet Animals and by the European proposal for a regulation on the welfare and traceability of dogs and cats, which aims to establish common standards for the breeding, keeping and placing on the market of these animals in the EU.</i> <i>In this context, the exclusion of hunting and work dogs from this draft Royal Decree would create a regulatory dysfunction that would be difficult to justify. The European proposal does not lay down, in general terms, an exclusion of these animals from the welfare</i>	It is not accepted for the reasons set out above.

		<i>framework when they enter into regulated breeding, keeping or marketing activities, and precisely aims to avoid regulatory divergences between Member States through uniform standards. Maintaining separate regulation at national level could lead to an uneven playing field between operators, as well as distorting the market, as animals originally reared for a specific purpose may subsequently move to another. Therefore, from the point of view of regulatory coherence, legal certainty and undistorted competition, it would be more appropriate to remove that exclusion and subject all dogs to a common welfare regime.</i> <i>Proposed amendment</i> Addition of two new paragraphs to point 3 to read as follows: g) The keeping of pets in private homes, which shall be governed by its specific rules. h) Zoological cores for pets.	
	AIZA	Clarification of the subject matter in relation to zoos and aquariums Article 1 defines the purpose of the Royal Decree in general terms, including the regulation of zoological centres for terrestrial animals in terms of authorisation, registration and animal health. However, the project expressly includes within its scope the establishments regulated by Law 31/2003 of 27 October 2007 on the conservation of wild fauna in zoos (including aquariums), which constitute a category with its own sector-specific legal regime. In this context, the current wording of Article 1 may create uncertainty about: — the relationship between the authorisation scheme provided for in this Royal Decree and that laid down in Law 31/2003, — as well as on the scope of the additional obligations on registration and animal health. It is therefore considered necessary to clarify the relationship between this legislation and the sector-specific legislation applicable to zoos and aquariums, in order to enhance legal certainty, avoid possible overlaps or duplications and ensure proper consistency in its application from the outset.	It is not necessary for the authorisation provided for in this project to be separate from that provided for in Law 31/2023, since it has a different purpose (animal health and welfare).

	Catalonia. Directorate- General for Agriculture and Rural Development	Article 1.3.c): This Royal Decree does not apply to establishments in ports and airports. We understand that these establishments must already have a REGA code as special holdings in accordance with the provisions of Royal Decree 479/2004, Annex III – section 2.6 (inspection centres). It would perhaps be more appropriate to include them in Article 1 (3) (a). Article 1.3 (d): This Royal Decree does not apply to veterinary centres (clinics, clinics and hospitals). We understand that these establishments will not be considered to be either a traditional zoological nucleus or a livestock holding (Royal Decree 479/2004). Thus, even if there are animals of species that could pose a health risk to livestock activity, these types of establishments will not be granted a REGA code. Article 1 (3) (h): This Royal Decree does not apply to the keeping of animals for personal non-commercial purposes in private homes. This paragraph relates to Article 3.1 (i): Private collections of birds, housing birds other than those collected as pet animals, which are considered as NZT. A private zoological collection of animal species likely to pose a health risk to livestock activity for a purpose other than agricultural activity, understood as the production of animals, and whose animals or products are not, under any circumstances, intended for human or animal consumption, should NOT be considered a NZT or livestock holding. For example: if someone wants to have goats or sheep as ‘pets’, they will NOT be classified as a NZT or as a livestock farm, even if they could pose a health risk to livestock activity. We believe that it should be clarified, because it is possible that in the end it will be determined whether they pose a risk, that they must	The exclusion is clear. Indeed, they are not recorded under this rule. If they are animals of production species (ewes, etc.) they must be registered in REGA, not in this RD.
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		have a REGA code, and that as the Royal Decree of the NZT excludes them from its scope, in the end they must be considered as a livestock holding for own consumption, even if their purpose is not productive.	
	Castile and Leon. Regional Ministry of Agriculture, Livestock and Rural Development	In paragraph 3: — Exclude physiotherapy centres, as well as clinics, etc., hygiene centres. In relation to paragraph (h), the keeping of animals for personal non-commercial purposes in private homes. Does it include all types of animals? Whether as a pet or as a livestock species, even if the owner has not yet declared it as a pet (e.g. a hen, a dwarf goat? Or are those listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law')? If the definition of the NZT in Article 2 (2) (a) already excludes any type of private home, it does not seem logical that the exclusions in Article 1 (3) only partially do so where the holding is for personal non-commercial purposes.	Not applicable, if the centre is operated by a veterinarian already excluded, if not compliant with the standard. Animals of production species must be registered in REGA.
	Aragon	Art. 1.g We consider that 15 dogs and 30 ferrets should be modified.	It is a large number from a health point of view.
	Colegio Oficial de Veterinarios de Madrid (Official Veterinary Association of Madrid)	— <i>Article 1 (3) subject matter and scope.</i> '3. This Royal Decree shall not apply to Zoological Numbers not specifically included in this Law, and in particular to: <i>Article 1. 3 (g):</i> <i>"(g) facilities where dogs and ferrets used in specific professional and sporting activities are kept, where the number of those dogs and ferrets does not exceed 10 individuals in the same location, except where their authorisation is required by specific regulations or, in the case of dogs, unless they are part of a packet, pick-up or jaury."</i> The existence of double denial and two exceptions means that it	The rule applies to facilities that house more than 10 dogs, or less in the case of gratings or facilities that are already subject to authorisation under another rule. The following has been clarified: <i>"(g) facilities where dogs and ferrets used in specific professional and sporting</i>

		is not clear to which dog facilities they will or will not apply, especially since Article 3 on the classification of traditional zoological centres now includes: <i>(h) Establishments housing animals used for specific sporting and professional activities and which are of the following species or categories: hunting dogs or ferrets, greyhounds, winter sports dogs, guide dogs, surveillance and security dogs, rescue dogs, assistance dogs, assisted intervention dogs. In all cases, kept in facilities away from private homes and having more than 10 animals for a single NZT.'</i> Indeed, the wording of the text leaves doubt as to which specific installations it covers. Nowhere in the text is it stated what happens to installations where there are up to 10 specimens of these animals, where they should be included and which rules apply to them. Article 1. 3 (f): (f) Zoos of pet animals not covered by this Royal Decree and regulated by specific legislation. We believe that all zoological centres should be included in the draft Royal Decree in order to avoid confusion and that all matters relating to these NZs should be centralised in a single updated regulation.	activities are kept where the number of such dogs and ferrets does not exceed 10 specimens in the same location, except: (I) where their authorisation is required by specific regulations. (II) or, in the case of dogs, when they are part of a packet, ankle or jaury.' Not accepted, this rule is different from that of zoological nuclei of pets.
	ROYAL SPANISH HUNTING FEDERATION	— With regard to Article 1, on the subject matter and scope, reference should be made to paragraph 3 (g), which excludes from the scope of the Royal Decree installations where dogs and ferrets used in specific professional and sporting activities are located where their number does not exceed 10 specimens in the same location, except in the cases expressly provided for therein. In that regard, it is considered that the provision contained in that paragraph is incomplete from a substantive point of view, in so far as it limits that exclusion to dogs and ferrets only, whereas the draft itself, in Article 2 (2) (e), defines the concept of an auxiliary game animal as including not only dogs and ferrets, but also cetreac birds and decoy birds.	Partially accepted, amended to specify animals (no longer only dogs and ferrets).

		— On the other hand, the established threshold of 10 animals (and even that of 15 referred to in other legislative developments under consideration, such as that of the Ministry of Social Rights, Consumer Affairs and Agenda 2030) is clearly insufficient and out of step with the reality of hunting activities. In this regard, it has been pointed out by various operators in the sector that, for example, in actions to control the population of rabbits in areas of overabundance, the use of ferrets is an essential tool, and the need to have a significantly higher number of specimens is common in order to ensure the effectiveness and sustainability of such actions. The setting of a reduced limit would, in practice, make it necessary to subject to a zoo regime installations which serve a functional purpose and are linked to the management of the natural environment, which is clearly disproportionate. In the same vein, there is no regulatory logic to the effect that the holding of a single specimen of bird for falconry or decoy automatically triggers the obligation to register as a traditional zoological nucleus. Such a provision would amount to a disproportionate extension of the scope of the provision, completely unrelated to the principle of proportionality, by treating individual situations in the same way as installations housing a significant number of animals or carrying out a structured activity. In practical terms, this results in an unnecessary and disproportionate administrative burden for operators who do not create a significant health risk and do not fit the purpose of the rule. In view of the above, we consider it necessary to revise the wording of Article 1 (3) (g): <i>“Installations in which ancillary hunting animals used for specific professional and sporting activities are stationed when their number does not exceed, in the case of dogs, 20 specimens over 8 months of age; for ferrets, 30 specimens older than 8 months; and of the other auxiliary animals defined in Article 2 (2) (e), 30 specimens, except when their authorisation is required by specific legislation or, in the</i>	The number referred to in the standard is fixed in relation to the risk to animal health and cannot be extended.
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		case of dogs, except when they form part of a packet, pick-up or jaury.” , thus creating a more realistic, proportionate criterion aligned with European Union law and in line with the usual practice in the sector.	
	GENERAL COUNCIL OF VETERINARY COLLEGES	Article 1 (3) (g) of this draft aims to establish prevention rules to minimise risks to the health of animals, humans and the environment, as well as to ensure animal welfare in certain groups other than livestock and companion animals not regulated by Law 7/2023 of 28 March on the protection of animal rights and welfare. In other words, it regulates the conditions for keeping, among other animals, dogs and ferrets used in sporting and professional activities, which are excluded by Article 1 (3) (e) of that Law. However, Article 1 (3) (g) of the draft also excludes these facilities from its scope when they house fewer than ten dogs or ferrets. We consider this exclusion to be contrary to the above-mentioned purposes, especially in the case of animals used in hunting activities due to the associated risks, as they are in direct contact with multiple wild game species. In addition, those using these animals in such activities must prove that they meet the animal welfare and health requirements and that they have the precise knowledge set out in this project. The future legislation should include all groups of animals or zoological centres to which Law 7/2023 of 28 March 2007 does not apply. Proposal: delete the exclusion in Article 1 (3) (g): <i>“(g) facilities where dogs and ferrets used in specific professional and sporting activities are kept, where the number of those dogs and ferrets does not exceed 5 individuals in the same location, except where their authorisation is required by specific regulations or, in the case of dogs, unless they are part of a packet, pick-up or jaury.”</i>	This number has been fixed precisely because of the risk to animal health.
	ASELCRE	The exclusions provided for in this Article may not be interpreted as excluding from the general system of administrative control, registration, traceability, welfare and animal health those activities which, owing to their species, entity, material purpose or level of risk, must be subject to a system coordinated with	It is unnecessary.

		the legislation on zoological centres for pet animals.	
	INTERCIDS	Amend Article 1 (3) (f) to read as follows: “Zoological nuclei of pet animals”. Delete Article 1 (3) (g) Amend Article 1 (3) (h) to read as follows: “The keeping of animals other than pets for personal non-commercial purposes in private homes”.	The rule should be coordinated with the Royal Decree of NNZZ on pet animals. This number has been set from the point of view of animal health risk. It is unnecessary, this rule does not apply to pets, this mention is for the rest.
	FAPAM	Proposed amendment Addition of two new paragraphs to point 3 to read as follows: (g) The keeping of pet animals in private homes, which shall be governed by its specific rules. (h) Zoological nuclei of pet animals	Both exclusions are already provided for.
	ANIMAL JUSTICE	The keeping in private homes and the operation of establishments keeping pets should be regulated by unified legislation capable of uniformly guaranteeing the principles of animal welfare recognised in the supranational, European and national framework. In this context, the exclusion of hunting and work dogs from this draft Royal Decree would create a regulatory dysfunction that would be difficult to justify.	It is not accepted for the reasons set out above concerning the appropriateness of two provisions, and that this Royal Decree cannot extend the scope of Law 7/2023.
	HAIEKIN ASSOCIATION	Expressly exclude from the scope dogs (<i>Canis lupus familiaris</i>), ferrets (<i>Mustela putorius furo</i>) and Santuarios/Rescue Centres for livestock species for protection purposes. Contradiction with Community law: Annex I to Regulation (EU) 2016/429 defines dogs and ferrets as ‘species of pet animals’ in an exhaustive manner, without distinguishing their activity. Including them in this Royal	Regulation 2016/429 is an animal health regulation, not an animal welfare regulation. The exclusion of these dogs derives from Law 7/2023. It is precisely these dogs that

		Decree because of their 'activity' (hunting or activity) contravenes the European legislation that this Royal Decree claims to transpose, creating clear legal uncertainty. We request that the draft Royal Decree be withdrawn on the grounds that it infringes the hierarchy of norms and the principle of legal certainty. The project defines its purpose by exclusion from Law 7/2023 to create a normative "escape route" for hunting and activity dogs. By downgrading its status to 'traditional animals' in order to avoid welfare standards as pets, the text conflicts with Article 3.3 of Law 8/2003 of 24 April on animal health, Article 3 (a) of Law 32/2007 of 7 November on the care of animals during farming, transport, experimentation and slaughter. and with European legislation, which does not allow for classifications based on utility to lower health and welfare protection. Animals originating from livestock holdings that reside in Santuarios and do not have a commercial purpose must remain outside this RD and be protected by animal welfare standards. A Sanctuary is not a livestock farm or a recreational "traditional nucleus". It is a protection organisation. Subjecting these centres to livestock farming requirements is disproportionate and distorts their social function.	are outside the scope of Law 7/2023 and Law 32/2007. There is a regulatory vacuum in relation to them, which is integrated with this law as regards the animal health and welfare requirements of the facilities that house them. In the case of sanctuaries, the regulation is proportionate, depending on the species they host (with exceptions even for slaughter).
	My friends the pigeons	In articulo1.3.g dogs and ferrets from specific activities have to be restricted to a threshold of 5 individuals in total in order to be required to register as NZT It does not make sense to exclude animal holdings from requirements that should also be additional to those laid down in their specific legislation, with the exception of the maximum number of animals that this Annex may not apply to them. Include self-consumption	The number of 10 is necessary for animal health reasons. The reference to self-

			consumption is not understood, as holdings for self-consumption are already registered in REGA.
	Maxi Lange	The scope is considered to be too broad as it includes heterogeneous realities. We request the exclusion of pets and animal protection centres or, failing that, their separate regulation.	The legislation must include all initial cases, pet animals are already excluded, and it makes no sense to regulate animal protection centres differently, as the project provides for health and welfare aspects, which must be common to each species.
	Government of the Autonomous Community of Valencia.	Include Article 1.3 (a) on the possibility of sale	Sale is not accepted, transfer or exchange of specimens is permitted in certain cases (falconry birds, etc.). It is precisely the fact that animals are not used directly that characterises the NZT as opposed to production livestock farms.
	Sanctuary Association Animal Compassion Animal Protection Association Saving Bumbled Animals	Proposal for amendment of Article 1 <i>Article 1. Purpose and scope of application.</i> <i>2. The provisions set out in this Royal Decree shall apply to the traditional zoological centres defined in Article 2.2, located throughout the national territory and meeting the maximum capacity requirements depending on the species, laid down in Annex I, as well as to the zoological centres for animal protection or sanctuaries, regardless of their capacity.</i>	The animal limits are established for health reasons, not limiting them poses a risk (think of a shelter of 1.000 equine animals), which must therefore be implemented, applying the general regulation depending on the species. In addition, shelters that already exist at the entry into force of the standard can maintain their current capacity.
	ARRECAL	The scope is particularly confusing. In general, the wording of the standard is unclear due to the excessive use of cross-references to other standards.	The normative reference is a common technique, eases the content of the text and makes it

		This is the case with Article 1 (2) in conjunction with Article 2 (2) of the text. Such a regulatory technique makes it very difficult for those to whom it is addressed to understand the rules.	easier to understand.
Article 2. Definitions	AnimaNaturalis International Foundation	Article 2 (2) (e). The draft introduces the definition of “auxiliary game animal”, which includes: hunting dogs packs of hounds ferrets falconry birds live decoys. However, the Royal Decree does not subsequently establish a specific system of welfare, housing or handling conditions adapted to these categories of animals, despite the fact that they are subject to particularly intensive conditions of use in the context of hunting. While the text contains general references to animal welfare and the proper handling of kept animals, these provisions do not address the specificities of auxiliary game animals, nor do they lay down differentiated requirements for facilities housing clusters of dogs used in hunting, beating or other hunting activities. The mere inclusion of the category of ‘auxiliary game animals’ in Article 2, without any subsequent specific legislative development, is insufficient to ensure an effective regulatory framework consistent with the stated objectives of the Royal Decree. It is therefore requested that the text incorporate specific requirements applicable to establishments keeping auxiliary game animals, including minimum housing, handling and control conditions.	There is no need for ad hoc regulation, the rule does not include specialities due to the purpose of keeping the animal, but the conditions are general. It is for the legislative development to include specific aspects, if deemed necessary, for the areas where these animals are kept.
	THE COMMUNITY OF MADRID	Drafting proposal: (g) <i>Rehala, recova or jauría: grouping of hunting dogs whose animals are kept by a single owner and which are used to participate as a whole in hunting, threshing or hooking, irrespective of their number.</i> In addition, it is stated that these are already registered in the Community of Madrid, in the register of zoological centres for pets (formerly in the Community of Madrid, centres for pets). With this	If they are already registered, no new registration is required. The reference to the sole holder is the only way to reconcile these animals with their holder.

		new regulation, they are in two registers and will therefore be duplicated.	
	IMIDRA	Prevention of misinterpretations by ancillary activities of CENSYRA Some occasional CENSYRA activities (training, technical visits, keeping animals for no immediate food purpose, testing of stallions) could be mistakenly confused with activities defining a Traditional Zoological Number. It might be appropriate to request that it be specified that the presence of animals used for research, technical training, testing or demonstration does not alter their status as livestock holdings or include them in the definitions in Article 2 (2).	These centres are already registered in REGA, there is no need for clarification.
	Regional Government of Valencia	In points (a) and (h), expressly exclude domicile.	It is not accepted, but the keeping of animals in private homes for non-commercial purposes is excluded (a pigeon is not in a private home in the strict sense of the term and, in any event, if a commercial activity (sale, etc.) is carried out with it, it will be a holding of production animals.
	Artemisan Foundation	It is proposed to add the following to the first definition of traditional zoological nuclei: <i>‘Traditional zoological centres: any establishment, including kennels intended for packs of hunting hounds,...’</i>	Not required.
	Marta Esteban Miñano, Animal Guardians Foundation Spain	Proposals for the definition of a shepherd dog or a guard dog, for the protection and handling of livestock, for an auxiliary game animal, for a game ferret, for a hunting hog or jaury or for a hunting dog should be eliminated. Proposed amendment: Deletion of paragraphs 2.d, 2.e, 2.f, 2.g and 2.h.	The definition should be maintained given its link to the scope of the standard.
	Official Chamber of Veterinary Surgeons of Murcia	— The draft legislation does not include a definition of the term ‘domicile’, although that concept may be decisive for the application of certain obligations or exceptions in the regulation of zoological centres. The absence of a definition may lead to divergent interpretations as to whether the term covers exclusively the habitual residence of a natural person or whether it also covers ancillary	This concept has already been sufficiently clarified in case-law, e.g. since STC 22/1984, FJ 5: ‘the inviolable home is a space in which the individual lives without necessarily being

		parcels, ancillary units or animal housing facilities. It should also be borne in mind that, from an urban planning point of view, there are situations in which there may be dwellings linked to livestock holdings or other activities with animals. It is therefore proposed to include an express definition of the term 'home' that clearly defines its scope, specifying whether or not it includes ancillary animal housing facilities.	bound by social practices and conventions and exercises his or her most intimate freedom. Therefore, this right not only protects the physical space itself, but also protects what is in it an emanation of the person and the private sphere of the person. Interpreted in this way, the rule of the inviolability of the home is broad in content and imposes a wide range of safeguards and powers, including those to prevent all kinds of invasions, including those which can be carried out without direct penetration by mechanical, electronic or other similar devices.'
	Official Chamber of Veterinary Surgeons of Murcia	— The project includes within traditional zoological centres private collections of birds kept in captivity for reasons other than food production. However, the scope of the activities permitted in those collections is not specified, in particular in relation to the breeding of animals, the transfer or exchange of specimens, the possible sale of animals. This lack of precision may lead to legal uncertainty and difficulties in distinguishing private collections from establishments engaged in the breeding and/or marketing of animals. It is proposed to incorporate a more precise definition of the concept of private collection that clearly delineates the permitted activities.	The definition in Article 2.2 (a) already covers the uses that bring the establishment within the scope of this Royal Decree.
	Dimitri Nagib Defranc Cevallos	Introduce a new point that formally defines 'Refugees/Sanctuaries and homologable spaces' as distinct centres from livestock farms and commercial zoos, the purpose of which is the rescue, recovery and keeping of animals for not-	It is not necessary, and it is extraneous to the rule.

		<i>for-profit, food or industrial purposes. Their rights and protection are recognised in Law 7/2023 of 28 March.</i>	
	Barcelona Chamber of Veterinary Surgeons	SECOND: ARTICLE 2 ON DEFINITIONS, PARAGRAPH 2, POINT (A): EXCLUSION OF PROFESSIONAL DOMICILE: Article 2 (2) (a) of the draft excludes from the definition of Traditional Zoological Number ('TZN') establishments keeping animals of species posing a health risk classified under Article 3 in 'private homes'. In the legal sphere, private domicile is understood as the space in which a person conducts his or her private life and which enjoys special protection. It may extend to ancillary areas which form part of it and are intended for the private use of the resident, thus including a property with a dwelling or a house with a garden. A large part or the majority of NZT in Article 3 (1) (h) housing dogs or ferrets from sporting or professional activities, do so in cheniles or cages located outside farms or garden houses. These animals will therefore fall outside the scope of this Regulation. The fact that a group of animals involved in sporting or professional activities is housed on a private property with a dwelling or in another establishment which does not have the status of a private home does not alter the health risks they present. It is not a reason not to specify the health and welfare standards to be applied to them. Therefore, in accordance with the first paragraph above, it is proposed to include groups of animals of this type among the NZT under Article 2.	Not required, for dogs the limit is 10 specimens. A chenil is not a home.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	As regards paragraph 2 (a), the express exclusion of private homes from the definition of traditional zoological nucleus introduces a significant ambiguity that may lead to regulatory gaps and the circumvention of the administrative and health checks provided for in the legislation. In practice, there are situations in which activities specific to a zoo, such as keeping a large number of animals, breeding, housing animals from third parties or activities linked to hunting or other uses, are carried out in the same area as a home. The current wording could allow these activities to fall outside the scope of the rule solely because of their formal location in a home, regardless of their nature	There is no risk of circumvention of the rule, and the definitions should be maintained to clarify the scope of the rule.

		or volume. With regard to paragraphs (d) to (h), the same reasons are given for the argument in Article 1. In addition, the proposals for the definition of shepherd dog or keeping dog, protection and handling of livestock, auxiliary game animal, game ferret, rehala or jauría or hunting dog should be eliminated. Proposed amendment 2. (a) Traditional zoological nucleus (NZT): any establishment, in accordance with the types referred to in Article 3, [...] Deletion of paragraphs 2.d, 2.e, 2.f, 2.g and 2.h.	
	AIZA	Adaptation of the definition of traditional zoological nucleus to zoos and aquariums. Article 2 (2) (a) defines the concept of a traditional zoological nucleus based on the presence of animals of species that may pose a health risk to livestock farming, linking that status to the species included in Implementing Regulation (EU) 2018/1882. However, this definition poses difficulties in its application to zoos and aquariums, as: — They host a wide diversity of wild and exotic species, many of which are not included in the aforementioned regulation, but may have health relevance. — Their activity is not related to livestock farming, but for conservation, education, research and exhibition purposes. — They are subject to a specific legal regime under Law 31/2003, which makes them a unique category within zoological centres. As a result, the current definition may lead to: doubts as to which species within a zoo or aquarium fall within the scope, as well as possible restrictive or fragmented interpretations of the applicable regime. It is therefore proposed to: - o either to introduce an express mention of zoos and aquariums as a specific category within zoos, - o Or to qualify the definition so that it is not limited exclusively to the species included in	The rules governing the inclusion of zoos, irrespective of the species they host, reflect the legislative development of the second final provision of Law 31/2003.

		Implementing Regulation (EU) 2018/1882 in the case of such establishments. All this in order to avoid regulatory gaps and strengthen legal certainty in the integration of zoos and aquariums into the animal health system.	
	Catalonia. General Direction of Agriculture i Ramaderia	Article 2.2.b): Owner: any natural or legal person, or entity without legal personality, that owns or is responsible for the NZT. We understand that the owner of the SIEMPRE NZT is (for administrative purposes as laid down in this Royal Decree) responsible for it, regardless of whether it is the owner or not. We propose the following wording: Owner: any natural or legal person, or entity without legal personality, responsible for the NZT, whether or not it is the owner of the NZT.	Accepted, and added even on a temporary basis.
	Castile and Leon	On point 2: With regard to section (a) Traditional zoological centre (NZT): zoos may contain species to which Implementing Regulation (EU) 2018/1882 does not apply (such as reptiles, amphibians or insects). — With regard to section 'b) Owner: any natural or legal person, or body without legal personality, that owns or is responsible for the NZT.', referring to the person responsible for the animals, as well as even on a temporary basis, as Royal Decree 479/2004 does for the owner of the holding and Regulation (EU) 2016/429 for the operator.	The zoo is recorded, not the species. Finding accepted.
	Maria Angeles Diaz Rodelgo	Article 2 on definitions introduces the category 'auxiliary game animal' without accompanying it with a specific regime of welfare conditions. The absence of regulations on housing, veterinary care, environmental enrichment and density control constitutes a regulatory gap that is incompatible with current animal protection standards. REQUESTS: The express inclusion in the articles of mandatory and verifiable minimum requirements.	It is not necessary, the regulation is general in a basic rule, and the Autonomous Communities may extend it in the exercise of their powers of implementing legislation.
	ROYAL SPANISH	We consider it necessary for this Royal Decree to include a	It is not necessary, the

	HUNTING FEDERATION	differentiated treatment adapted to the nature of packs of hunting hounds, in line with the approach adopted by European legislation, which justifies the proposals for flexibility, exclusion or adaptation contained in the above arguments. Furthermore, with regard to the definitions set out in Article 2 (e) to (h) relating to auxiliary animals for hunting, game ferrets, hunting queens, hunting hounds and hunting dogs, it is considered appropriate to expressly include the reference to the federation licence, in addition to the hunting licence currently provided for in the text. — With regard to the definition of ‘rehala’, ‘recova’ or ‘jauría’ (Article 2 (g)), as this is the first piece of animal health legislation at national level to define this concept, it is essential to specify the number of animals making up it, in order to ensure legal certainty for the hunting community. It is proposed that the definition should read as follows: <i>‘Rehala, recova or jauría: grouping of 21 or more hunting dogs whose animals are kept by a single owner and which are used to participate as a whole in hunting frames, beatings, hooks or other authorised forms of hunting.’</i> — Article 2 (h), the current wording <i>‘by linking its condition to its actual use in an authorised hunting activity’</i> may create legal uncertainty, implying that the animal loses that status outside the specific time of the activity (for example, when it is in the pound, in transit or at the owner’s home). This problem also applies to the definition of game ferrets.	regulation is general in a basic rule, and the Autonomous Communities may extend it in the exercise of their powers of implementing legislation. Not accepted, federation licence does not exist in all Autonomous Communities. It will be up to the Autonomous Communities in which it exists to decide whether to include this possibility. It is the rules of the Autonomous Communities that must conceptualise reala or recova, e.g. in Andalusia reala is between 16 and 24, etc. The link with the licence, not with the continued exercise of the hunting activity, is not precise.
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		It is therefore proposed that the definition should read as follows: <i>A dog used for a specific activity for which the holder has a hunting licence issued by the competent body and a corresponding federation licence, which is usually used for any authorised hunting activity.</i> Finally, it is proposed that Article 2 (2) expressly include feline colonies within the scope of the Royal Decree, in so far as they constitute concentrations of animals that may give rise to health, environmental and public health risks that must be regulated.	Colonies are excluded from the scope of the standard, are pets, and will be regulated if applicable in the Royal Decree of NNZZ on pets.
GENERAL COUNCIL OF VETERINARY COLLEGES	A large part or the majority of NZT in Article 3 (1) (h) housing dogs or ferrets from sporting or professional activities, do so in cheniles or cages located outside farms or garden houses. These animals will therefore fall outside the scope of this Regulation. It is not a reason not to specify the health and welfare standards to be applied to them. In addition, the definition of traditional zoological nucleus is based solely on the health risk to livestock activity. However, facilities that house hunting dogs or other animals ancillary to sporting or professional activities are subsequently included, the health relevance of which is not necessarily related to livestock activity, but rather to animal health or public health aspects. This situation may lead to a lack of consistency between the definition and classification of establishments covered by Article 3. It is therefore proposed to adjust the definition so that it also covers these cases. Proposal: <i>Traditional zoological nucleus (NZT): any establishment, excluding private homes, in accordance with the types referred to in Article 3, where animals of species likely to pose a health risk to animal health, public health or livestock activity are bred or kept, which are listed in Commission Implementing Regulation (EU) 2018/1882 of 3 December 2018 on the application of certain disease prevention and control rules to categories of listed diseases and establishing a list of</i>	A chenil is not a residence in principle (#RAEconsultas. The word ‘chenil’ is French and is translated in various ways, notably as ‘perrera’; however, the object to which it refers is also referred to by other names, such as ‘box’ or ‘stand’. However, since ‘chenil’ does not present any problems of compliance with Spanish law, it could be used without hindrance, with the plural ‘cheniles’), and a limit of 10 animals has already been set for dogs.	

		<i>species and groups of species posing a considerable risk for the spread of those listed diseases, the purpose of which is other than agricultural activity, understood as the production of animals, and the animals or products of which are under no circumstances intended for human or animal consumption.</i>	In part, the reference to the risk to health or public health seems appropriate. And the rule does not regulate the keeping of animals in homes, if it is lucrative.
	GENERAL COUNCIL OF VETERINARY COLLEGES	Article 2 (c) The draft legislation does not define with sufficient clarity the role of the veterinarian responsible for traditional zoological centres. It is considered necessary to determine in which cases the designation of a responsible veterinarian is mandatory, what his/her tasks and powers are. From a health point of view, it is proposed that certain zoological centres, depending on the number of animals, the species kept or the associated health risk, must have a veterinarian responsible. Their tasks should include at least animal health supervision, establishment and monitoring of health programmes, epidemiological surveillance, supervision of the use of prescribed veterinary medicinal products, advice on biosecurity.	The legislation does not regulate professional practice; the aspects cited are more specific to the legislative development of the Autonomous Communities.
	ASELCRE	The classification of the establishment and the applicable regime may not be determined solely by the subsequent functional destination of the animal, but by the species, the activity actually carried out in the establishment and the level of health risk, animal welfare, traceability and concurrent administrative control.	The standard already provides for such criteria.

	INTERCIDS	Article 2 should be amended by deleting the definitions in points (d), (e), (f), (g) and (h).	It is not accepted for the reasons set out above.
	FAPAM	Proposed amendment Deletion of paragraphs 2.d, 2.e, 2.f, 2.g and 2.h.	It is not accepted for the reasons set out above.
	ANIMAL JUSTICE	Proposed amendment Deletion of paragraphs 2.d, 2.e, 2.f, 2.g and 2.h.	It is not accepted for the reasons set out above.
	My friends the pigeons	The definition of REFUGIO DE ANIMALES should not include whether or not it is open to the public. If a school farm and zoos and even CRAs can open to the public, there is no reason to close access to sanctuaries The concept of an ANIMAL sanctuary should be included as it is an international and socially established term. The live hunting decoy has to be eliminated as it is animal abuse in its pure state and is not legalised, even if you include it in this NRDNZT.	If it is a refuge, it makes no sense for it to be generally open to the public, then it would be another type of nucleus. It is considered to be a partial opening, disclosure purposes, not charged, etc. The sanctuary concept should not be extended to animals, even by its very definition in the SAR dictionary. Hunting decoys are legal, subject to certain restrictions.
	Maxi Lange	There is a contradiction in the definition of traditional zoological centres, as they do not have an agricultural purpose but are subject to a system specific to livestock holdings. We call for them to be revised, for objective risk criteria to be introduced and for sanctuaries to be recognised as a distinct category.	The regime is appropriate from an animal health point of view, and the necessary specific aspects for shelters are already provided for.
	ANDALUSIAN COUNCIL OF OFFICIAL CHAMBERS OF VETERINARY SURGEONS	VETERINARY PERSON FROM NZT: (ARTICLE 2.2 (C)) We understand that this definition should make it clear that the veterinarian the NZT is responsible for drawing up, implementing and supervising the Zoo Health Plan.	This is an aspect of the legislative development of the Autonomous Communities.
	ANDALUSIAN COUNCIL OF	Paragraphs (d), (e), (f), (g) and (h); “(d) <i>Pastor or ranching, protection and handling of livestock, (e) Auxiliary game animal (f)</i>	They are precise concepts for the application of the standard.

	OFFICIAL CHAMBERS OF VETERINARY SURGEONS	<i>Game uron (g) Rehala, recova or jauría and (h) Game hunting."</i>	
	ARRECAL	The definition should be: (g) <i>'Rehala, recova or jauría: grouping of 16 or more hunting dogs whose animals are kept by a single owner and which are used to participate as a whole in hunting frames, beatings, hooks or other authorised hunting arrangements'.</i>	It depends on the hunting regulations of each Autonomous Community.
	ARRECAL	(h) Hunting target. This wording implies that the dog when the hunter has it on his dog, in the street or at home is no longer a hunting dog; this creates absolute legal uncertainty for the interpretation of the application of Law 7/2023, of 28 March, on the protection of animal rights and welfare (this issue is absolutely transposable to the definition of hunting ferrets). The definition should therefore be 'a dog used for a specific activity, the holder of which has a hunting licence issued by the competent hunting body of any Autonomous Community, which is usually used for any authorised hunting activity'.	The standard regulates the requirements of the Nucleo, not the animal welfare rules applicable to the animal.
Article 3. Classification of traditional zoological nuclei.	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	Article 3 (1) (h) Add: <i>In the case of dogs forming part of a pacemaker, recova or jauría, they shall be integrated into this NNZZT regardless of the number of specimens.</i>	The number of 10 is appropriate for animal health.
	ROYAL SPANISH HUNTING FEDERATION	— Point (f), concerning establishments keeping cetreac birds, game decoy birds and pigeons whose activity is colombiculture and colombophilia, provides that such establishments are to be included in this category provided that the animals are not sold. In that regard, it does not seem appropriate to impose an absolute restriction on sale , in so far as, in certain traditional or sporting activities linked to those practices, there may be a transfer, transfer or exchange of specimens between breeders, sportsmen or keepers of birds which in no way involves a substantial economic activity. It is therefore considered appropriate to amend this provision in order to prevent such a restriction from creating unnecessary limitations or restrictive interpretations in respect of activities	If animals are sold, a gainful activity is already carried out and they are production animals, subject to authorisation and registration by REGA. Exchanges and transfers of animals are permitted.

		that are part of the normal operation of these arrangements and that are, where appropriate, subject to the specific rules applicable. — It is proposed to amend the wording of Article 3 (1) (h) so that the quantitative criterion is set at more than 20 dogs over 8 months of age and more than 30 ferrets over 8 months of age, aligning it with the proposed thresholds for the exclusion area in Article 1 (3) (g), thus ensuring greater regulatory consistency, legal certainty and alignment with standard practice in hunting and sporting activities.	A number greater than 10 is appropriate for reasons of health risk and cannot be reduced.
	AnimaNaturalis International Foundation	Article 3 (1) (h) provides that establishments housing hunting dogs or ferrets which exceed 10 animals are to be regarded as zoological nuclei. However, the project will: it does not lay down specific requirements for rehala, recova or jaury. it does not provide for minimum housing conditions adapted to these groups, nor does it regulate the conditions for the transport, breeding or removal of animals. Given that packs of hunting hounds are one of the most widespread systems of collective keeping of dogs in Spanish hunting, the absence of specific regulation constitutes a serious regulatory omission.	The law regulates the NNZZTT, not the transport, breeding or removal of animals.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	The wording of subparagraph (h) reads as follows: <i>‘Establishments housing animals used for specific sporting and professional activities and which are of the following species or categories: hunting dogs or ferrets, greyhounds, winter sports dogs, guide dogs, surveillance and security dogs, rescue dogs, assistance dogs, assisted intervention dogs. In all cases, kept in facilities away from private homes and having more than 10 animals for a single NZT.’</i> Taking into account the maxim in the very wording of the preamble to this Royal Decree that ‘it is better to prevent than to cure’, it is understood that health precautions must be extreme. It is therefore particularly contradictory and relevant that, in the wording of Article 3 (h), there is an inconsistency in favouring a risk arising from the fact that groups of fewer than 10 dogs or ferrets are expressly exempted	10 animals is the appropriate number for health risk reasons, as explained above.

		where they are intended for hunting. Specifically, groups of fewer than 10 animals are also likely to suffer from poor conditions of maintenance, hygiene and health, in addition to the lack of necessary and proper veterinary supervision, thereby potentially posing a serious risk to the transmission of diseases and increasing vulnerability. That is why: referring to the health, welfare and traceability risk involved in exempting from the same obligations under this Decree those responsible for protecting groups of fewer than 10 dogs or ferrets, as well as the clear contradiction and comparative disadvantage involved in discriminating against the same species on the basis of the activity for which it is intended that: I request: the wording of Article 3(h) is deleted. CONSIDERATIONS: For the time being, the classification categories for Traditional Zoological Numbers specified in the General Register of Livestock Holdings (Registro General de Explotaciones Ganaderas – REGA) are useful. However, steps should be taken to ensure that measures which are totally unnecessary and liable to cause physical or psychological suffering to individual animals, solely for the sake of human amusement, are progressively banned. We refer to the following typologies: — Zoological parks. — Travelling circuses and establishments for animal acts. — Establishments for cetrace birds, game decoys or pigeons intended for colombiculture or colombophilia. — Establishments housing hunting dogs or ferrets. — Private bird collections.	The prohibition of such establishments requires legislation with the status of a law.
	Regional Government of Valencia	It is proposed to include 3 more classifications relating to equine animals and to remove them from Royal Decree 804/2011 of equine management: o Non-commercial or leisure equine holdings: a holding used for the maintenance of equidae by a private individual, with no immediate business or commercial purpose, provided that it does not exceed 5 LU, in which case it would be considered as a holding for	They are not accepted as holdings included peacefully in the REGA as production holdings, regardless of the fact that in some holdings a lucrative activity is carried out (rental of pens, etc.).

		equestrian practice. o Farms for equestrian practice: facilities where animals are kept permanently for recreational purposes. Social support establishments shall also be understood to be such establishments, which are holdings that house equidae for the purpose of carrying out hypotherapy. o Concentrations of equines of competition or playful/cultural type: these are holdings which, on a permanent or temporary basis, are used to house equidae for the development of equestrian sport. Point (f) What happens if animals are sold?	The absence of direct use of the animals is closely linked to the concept of the NZT if they are sold in other establishments, such as breeders, etc.
	THE COMMUNITY OF MADRID	Drafting proposal: Article 3.1. <i>'Without prejudice to the provisions of Royal Decree 479/2004, of 26 March, and the corresponding sectoral regulations, the Traditional Zoological Numbers (NNZZT) shall be classified and registered in the General Register of Livestock Holdings and NNZZT (REGA-NTZ), according to the following types:'</i>	Finding accepted.
	THE COMMUNITY OF MADRID	Article 3. Point (h) <i>Establishments housing animals used for specific sporting and professional activities and which are of the following species or categories: hunting dogs or ferrets, greyhounds, winter sports dogs, guide dogs, surveillance and security dogs, rescue dogs, assistance dogs, assisted intervention dogs. In all cases, kept in facilities away from private homes and having more than 10 animals for a single NZT.</i> Clarifying: These establishments also appear in the draft Zoological Numbers of Pet Animals with other conditions of census and age. This situation could adversely affect the principles of legal certainty, regulatory coherence and administrative efficiency. In addition, it is stated that in the Community of Madrid these are already registered in the register of zoological centres for pet animals	This aspect will be corrected in both Royal Decrees.

	(formerly in the Community of Madrid pet centres).	
THE COMMUNITY OF MADRID	Section 1 reads ‘... Traditional Zoological Numbers (hereinafter NNZZT) shall be classified and registered in the... Register in accordance with the following types: (a) to (i) Paragraph 3 reads ‘Each type of NZT shall have a single classification for registration purposes. However, it may have more than one classification under one REGA code...’ Clarification is requested: In order to register these holdings in the REGA application (to be returned to national SITRAN), please clarify the definitions “type” and “classification”. In other words, if the ‘rates’ defined in Article 3 (1) (a) to (i) each correspond to a ‘HOLDING TYPE’ (i.e. they are ‘types of holding’ as defined in REGA) or corresponding to a ‘ZOOTECHNICAL CLASIFICACION’ (‘ZOOTECHNICAL ORIENTATION’) within a single type of holding called ‘TRADITIONAL ZOOLOGICAL NONE’. This must be clearly defined in this Royal Decree for the purpose of classifying these holdings in REGA, as well as for the preparation by MAPA of the document containing the IT amendments that must be made to the REGA application of each Autonomous Community in order to be able to record these holdings.	Finding accepted. type has been replaced by zootechnical classifications.
THE COMMUNITY OF MADRID	Paragraph 2. Drafting proposal: <i>Each type of NZT shall have a single classification for registration purposes. However, more than one of the classifications referred to in point 1 may be registered under the same REGA- NTZ code, as laid down in Royal Decree 479/2004 of 26 March, if the competent authority considers that biosecurity measures are adequate and sufficient to prevent the introduction and transmission of diseases and that they have the appropriate operating conditions to do so, in accordance with the legislation in force.</i>	It is unnecessary to make that qualification, NNZZ being a type of REGA holding.
Artemisan Foundation	It is proposed that packs of hunting hounds be expressly recognised in Article 3 (1) (h) , as was done in the Order of 28 July 1980 laying down rules on zoological centres, equalisation establishments, centres for the promotion and care of pets and the like.	There is no need for specific regulation, which applies to all zoological centres.
Official Chamber of	The project does not clearly establish the administrative classification	In the case of breeding of pets

Veterinary Surgeons of Murcia	of certain establishments dedicated to the keeping, breeding and reproduction of kept animals, such as ornamental bird breeding (psittacidae, finches, etc.), bird of prey breeding, reptile breeding or amphibians. In many of these cases the activity may consist of the reproduction of animals and the occasional or regular sale of specimens, even where the activity is not of a profit-making nature or the income obtained does not cover the costs of maintenance. It is considered necessary to clarify in the standard the classification applicable to this type of establishment and its inclusion in the rules on zoological centres.	which may in future be included in the Positive List of pets, they shall be governed by Law 7/2023 and its implementing rules. Otherwise, they will not fall within the scope of this Royal Decree, and the general animal health rules will apply to them.
Dimitri Nagib Defranc Cevallos	In section 3a (Animal protection centres) or as a new wording in the draft after the current 'h', it should clearly specify and add to the Refugees/Sanctuaries or homologable centres as a category of their own, permanently removing them from the 'agriculture and livestock farming' framework and differentiating them from the other typologies of Zoological Numbers, in order to give real protection to all animals present. Suggested text: <i>'Shelters/Sanctuaries or centres that can be recognised as a separate category, the reality of which is defined by all the fauna present in the centre, escape the specific realities of Law 7/2023.'</i>	There is no need for such a broad definition, which, moreover, is contradictory and its meaning and purpose are not understood.
Barcelona Chamber of Veterinary Surgeons	ARTICLE 3 ON CLASSIFICATION OF TRADITIONAL ZOOLOGICAL NUCLEI, PARAGRAPH 1, POINT (H) <i>For the reasons set out in the first and second paragraphs above, it is proposed that Article 3 (1) (h) of the draft be worded as follows:</i> <i>(h) Establishments housing animals used for specific sporting and professional activities and which are of the following species or categories: hunting dogs or ferrets, greyhounds, winter sports dogs, guide dogs, surveillance and security dogs, rescue dogs, assistance dogs, assisted intervention dogs. In all cases, kept in facilities away from private homes and where the number of animals exceeds 10 animals for a single NZT.</i>	It has already been stated that 10 is considered to be the appropriate number from a health point of view.
Balearic island	Article 3 (1) (c) school farms. The draft defines the NZT as	It is clarified in the preamble

		establishments whose purpose is other than agricultural activity, understood as the production of animals, and whose animals or products are under no circumstances intended for human or animal consumption (Article 2.2 (a)). However, the actual activity of many school farms includes the keeping of productive animals, which may involve the use of products (eggs, milk, etc.) and even commercial use. This hampers the internal coherence of the project (Articles 2.2 (a) and 3.1 (c)) and creates legal uncertainty and official control. Application: exclude 'school farms' from the NZT catalogue. Drafting proposal (amendment of Art. 3.1 (c)) Possible text: (c) (Delete) School farms.	that no marketing activity can take place.
	Balearic island	Article 3 (1) (d) shelters: distinguishing permanent (NZT) from temporary (REGA) production animals Article concerned: Art. 3.1 (d) and its permanent/temporary sub-classification. The project allows for 'permanent' and 'temporary' shelters within the NZT. However, temporary shelters for productive animals, by their very functional logic, can act as transit facilities from which animals return to production and breeding holdings, which is incompatible with the philosophy of the NZT of Article 2.2.a (no food chain, no agricultural activity) and, moreover, connects with the movement regime of Article 13.1.b that allows movements to REGA from temporary shelters. Application: keep only the permanent shelter in the NZT; temporary shelters housing production animals must be included in REGA as a livestock establishment/handling facility under sectoral rules. Drafting proposal (amendment to Article 3.1 (d)) “(d) Permanent shelters of kept animals other than pet animals listed in Annex I to Regulation (EU) 2016/429, not open to the public, where the animals are kept for the long term until death and where the animals or their products are not destined for human or animal consumption.	Not accepted, temporary centres should be allowed until the final destination of the animal is decided.

		(Delete) the category “temporary” in the scope of the NZT. Note: temporary establishments housing production animals shall be governed by Royal Decree 479/2004 and the applicable sectoral regulations.	
	Balearic island	Article 3 (1) (f) Colombian/Colombian: inconsistency by reproduction/exchange; or REGA or complete and homogeneous derogation Article 3.1 (f) includes cetreeria, reclamo and pigeons for colombiculture/colombophilia ‘provided that they are not sold’. In practice, in colombiculture/colombophilia, specimens are frequently bred, exchanged or transferred, which makes it difficult to inspect and prove that they are ‘not sold’, creating a regime that is difficult to control and potential means of circumvention. In addition, the breeding activity (albeit without formal sale) complies with the criterion of Article 2.2a (non-agricultural purpose). Application (preferred option): bring these activities to REGA if there is regular breeding/exchange. Alternatively: if kept in the NZT, remove the criterion ‘provided they are not sold’ and regulate them uniformly in the NZT with clear movement and documentary control rules. Drafting proposal (amendment to Article 3.1 (f)): Option A (REGA for colombiculture/colombophilia): <i>(f) Establishments keeping fallow birds and game decoy birds.</i> Colombian and Colombian activities, where they involve breeding, exchange, transfer or regular transmission of specimens, must be registered in accordance with Royal Decree 479/2004 and applicable sectoral regulations. Option B (keep in NZT without “as long as they are not sold”): <i>(f) Establishments keeping fallow birds and game decoy birds, provided that they are not sold and pigeons intended for colombiculture and colombophilia for</i>	Partially accepted and specified: ‘without prejudice to a specific and residual activity of exchange or transfer of copies.’

		<i>purposes other than agricultural production and not intended for animals or products intended for human or animal consumption.</i>	
	Balearic island	Article 3 (1) (i) Private bird collections for competitions/fairs: need for REGA for guidance and sectoral coherence Article 3.1 (i) includes poultry intended for 'shows, races, exhibitions, competitions, breeding', excluding meat/egg production. In practice, competitions where poultry are kept for exhibition are usually livestock fairs, requiring traceability and often movement/guide documentation. In order to avoid duplication and to be consistent with sectoral planning (and with REGA itself as an umbrella register), these farms should be located in REGA. Application: exclude from the NZT catalogue under Article 3.1.i collections/establishments participating in livestock fairs/competitions, integrating them into REGA. Drafting proposal (amendment to Article 3.1 (i)) (I) (Delete) Private collection of poultry.	In part, it is specified that 'provided that production animals are not involved'.
	Balearic Island	Article 3.2: multi-classification under the same REGA code and management problem Article 3.2 allows several NZT classifications to be registered under the same REGA code, if the competent authority finds that biosecurity is sufficient. This creates practical problems: a single code can mix different health and movement realities. In particular, if production animals (REGA) coexist with NZT animals, it complicates the management of censuses, movements, inspection and traceability. Drafting proposal (amendment to Art. 3.2) <i>2. Each type of NZT shall have a single classification for registration purposes. However, more than one of the</i>	It is accepted in the terms set out by Castile and Leon.

		<i>classifications referred to in point 1 may be registered under the same REGA code only where they all correspond to NZT categories and do not coexist with production or breeding holdings subject to sectoral rules, and provided that the competent authority considers biosecurity measures to be appropriate.</i>	
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	It is proposed that Section 3.1 (d) be amended to include a specific definition of animal sanctuaries, distinct from other types of establishments keeping animals. This amendment responds to the need to provide greater conceptual clarity and legal certainty to an organisational reality that has become increasingly relevant in the field of animal protection. First, sanctuaries constitute a distinct category of traditional reception centres or shelters, in so far as their main purpose is not the adoption or placing on the market of animals, but the permanent care of animals in distress, abandonment or rescue, ensuring their maintenance and welfare for the rest of their lives. This role brings them closer to a permanent protection and care activity than to an animal management model aimed at their reintegration into the pet market. The proposed definition is also consistent with the existing regulatory framework. In particular, Law 7/2023, of 28 March, on the protection of animal rights and welfare, recognises the role of animal protection entities registered in the Register of Animal Defence Associations (RAD) and establishes a general framework for action for entities whose purpose is the protection and care of animals in vulnerable situations. In this context, sanctuaries can be understood as a specific form of facilities linked to such entities, aimed at the long-term or permanent care of rescued animals. Similarly, the reference to the animals listed in Annex I to Regulation (EU) 2016/429 of 9 March 2016 on transmissible animal diseases makes it possible to define adequately the material scope of the animals eligible for reception in this type of facility, ensuring	Partially. There is no need for such a broad definition of shelters, less linked to an RAD-type entity, which would limit the existence of shelters in a non-proportionate manner. We agree to include “<i>except in awareness-raising activities</i>”.

		consistency with the health and veterinary control rules applicable in the European Union. The proposal also includes a relevant clarification stating that these establishments will not have the character of establishments open to the public, except in the context of awareness-raising or education activities. This provision is appropriate for preserving the nature of these spaces as places for the care and recovery of vulnerable animals, avoiding their assimilation to exhibition facilities or recreational exploitation. In view of the above, the proposed amendment helps to clarify the legal regime for sanctuaries, institutionally recognise their role in the animal protection system and ensure adequate consistency with the national and European regulatory framework on animal welfare. Proposed amendment Paragraph 1 (d) is amended to read as follows: <i>(d) Sanctuaries: Shelters for kept animals, other than pet animals listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, for the care of such animals in distress, raising public awareness and linked to an RAD-type entity, as defined in Law 7/2023 of 28 March on the protection of animal rights and welfare. These establishments, which shall under no circumstances be establishments open to the public, except for awareness-raising and educational activities, may be:</i> <i>1°. Permanent: animals are kept on a long-term basis until death.</i> <i>2°. Temporary</i> Deletion of paragraph 1.h.	
	AIZA	Recognition of zoos and aquariums as a distinct category Article 3 includes within the traditional zoological centres the	This standard regulates basic NNZZ requirements in terms of

		establishments regulated by Law 31/2003 of 27 October, identifying zoos and aquariums as one of the categories of establishments. However, their inclusion takes place within the framework of a general typology, without expressly recognising their individual character as establishments subject to a specific legal regime. In this respect, zoos and aquariums have different characteristics compared to other zoological centres, including: — its primary purpose of preservation, education and research, — the management of wildlife, which is often protected, — and being subject to a system of authorisation, inspection and own control under Law 31/2003. It is therefore considered that their treatment under Article 3 should be strengthened by expressly recognising zoos and aquariums as a distinct category with a specific regime. In such a way as to avoid their being treated in the same way as other types of establishments of a different nature.	animal health and welfare, and these must be applicable to all typologies, with no unjustified exceptions, and there are no grounds for treating zoos and aquariums differently, which is not specified either.
	Catalonia. General Direction of Agriculture i Ramaderia	Paragraph (b) Travelling circuses and establishments for animal shows In the case of travelling circuses, where will it be registered for REGA? Where does the company managing it have its registered office? And for movement purposes, would it be similar to a non-permanent livestock competition? Paragraph (c) School farms, understood as establishments open to the public for educational purposes, which keep animals in captivity other than pets and do not keep live animals of wild species for exhibition. If they <u>also</u> keep pet animals in captivity, will they have two codes, one as NZ and one as NZT (in this case REGA code)? We believe that it should be clarified whether it does not contradict the provisions of Royal Decree 479/2004, Annex III, paragraph 2.3:	The logic is that travelling circuses are registered in the community where they are based or where their holder's home is located. The rules governing the movement of animals shall in each case be those applicable to each species. There can be no pets on the farms as such (they can be kept by the people who own them or work on them).

		Leisure, <i>teaching</i> and research farms: facilities where animals are kept permanently for <i>leisure or teaching purposes</i>, including centres where animals of the species listed in Annex I are kept for scientific experiments. If a school farm intends to take advantage of the production of any species (e.g. eggs or milk), is it understood that this species would become a production species, and would therefore not be considered a NZT? Under the same REGA code, is it permitted to have species considered to be NZT and others considered to be a livestock holding? Section (f) Establishments keeping fallow birds, game decoys and pigeons whose activity is colombiculture and colombophilia, provided that they are not sold. We understand that no such number of birds is established: if they are dedicated to this purpose, they must all be registered as NZT, regardless of the number of birds. If they sell such birds, what is their status? In any event, they would not be a livestock holding because their products are not intended for the food chain. Section (h) Establishments housing animals used for specific sporting and professional activities and which are of the following species or categories: hunting dogs or ferrets, greyhounds, winter sports dogs, guide dogs, surveillance and security dogs, rescue dogs, assistance dogs, assisted intervention dogs. In all cases, kept in facilities away from private homes and having more than 10 animals for a single NZT. If you <u>also</u> keep dogs with other destinations, will you have two codes, one as NZ and one as NZT (in this case REGA code)? Paragraph (i) Private collection of birds, housing birds other	If it is sold, it is already an ordinary commercial activity and must be registered with REGA, given that, according to Law 8/20003, they are productive animals. If a dog is kept for another destination (e.g. breeders), they will indeed have a pet NZ code and a pet NZT code.
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		than those collected as pet animals, including those intended for shows, races, exhibitions, competitions, breeding, and kept in captivity for reasons other than the production of meat, eggs or products other than meat and eggs. We understand that this includes the species referred to in Article 2 (1) (l) of Royal Decree 637/2021: Zoological nucleus with poultry: private zoological establishments and collections keeping poultry for purposes other than poultry rearing or breeding, meat production and egg or other production. Therefore, will all private collections of birds considered as pets be considered as non-traditional NZ? It should be borne in mind that they may be animals that could pose a health risk to livestock farming. We propose to add a new point (j) for establishments selling poultry or rabbit species to be kept as pets (unless already listed as NZ).	If they are birds of species included in the List of Pet Animals, they shall be governed by the Royal Decree on the NZ of Pet Animals, otherwise by this Royal Decree. The Royal Decree establishes the basic regulations applicable to the facilities, depending on the health risk, the Autonomous Communities may require more requirements for such a NZT. If they are species included in the List of Pet Animals, they shall be governed by the Royal Decree of NZ on Pet Animals, otherwise by this Royal Decree.
	Catalonia. Directorate-General for Agriculture and Rural Development (Direcció General de Agricultura i Ramaderia)	Article 3.2: Each type of NZT shall have a single classification for registration purposes. However, more than one of the classifications in point 1 may be registered under the same REGA code, laid down in Royal Decree 479/2004, if the competent authority considers that biosecurity measures are adequate and sufficient to prevent the introduction and transmission of diseases and that they have the appropriate operating conditions to do so, in accordance with the legislation in force. If species considered to be NZT and other species considered to be	Accepted with the wording of Castile and Leon.

		livestock farms may be available in the same facility under the same REGA code, we believe that this should be specified in the wording of the Royal Decree. In this case, it would be possible to report both classifications as a livestock holding (breeding, with the corresponding zootechnical classifications, or special classifications) and as a NZT (with the corresponding zootechnical classification). If this possibility is possible, we propose to add a new paragraph 3 to Article 3: Article 3.3: Under the same REGA code, the activities listed in Annex III to RD 479/2004 and the activities listed in Article 3 (1) of the same RD may be authorised provided that the competent authority considers that biosecurity measures are adequate and sufficient to prevent the introduction and transmission of diseases and that they have the appropriate operating conditions to do so, in accordance with the legislation in force.	
	Catalonia. Department of Territori, Habitatge I Ecological Transitions	Articles 3 (c) and (g). Establishments at ‘quarantine’ ports and airports should be specified, since there may also be facilities for the maintenance of wild birds managed by external entities contracted to carry out their activity (such as bird scaring at airports) which are located outside and should therefore be considered as a core and controlled since there is a health risk. We do not understand an exception that derogates from... and re-exempts... In the end, we do not know what is at the core and what is not. <i>“Shall not apply to (h) the keeping of animals for personal non-commercial purposes in private homes”</i> Animals belonging to the positive list (thus the type of private zoological collection will no longer exist)	Partially accepted, it is specified that it refers to the centres referred to in Article 3.25 of Law 8/2003 of 24 April. These birds will be a Blind Bird NZT.
	Catalonia. Department of Territori, Habitatge I Ecological Transitions	- o Art. 3 (b) “Station of hibernate of travelling circuses”, if not specified, it would refer to all places where they stop. - o “3.d) shelters for kept animals other than pets shall under no	These hiberna sites do not need to be specified.

		<i>circumstances have the character of an establishment open to the public.” These types of establishments are privately owned and often need to open them to the public in order to be self-financed by the financial income obtained from the visits, and thus be able to cover the costs arising from the maintenance and feeding of the animals, staff, training, facilities, veterinary services, etc. If visits are not allowed, subsidy lines to join should be established to allow them to survive, as they are useful and necessary centres for the administration, as they resolve the problem of abandoned or confiscated animals, which is expected to increase as soon as the positive list of pet animals is approved.</i> - o <i>“(f) Establishments keeping fallow birds, provided they are not sold.” Breeding centres are reared for sale (or “ceder”). Does this mean that they are then not considered NNZZTT? Does not make any sense that depends on the possible sale, nor does it make sense for a finch collection (to give an example) to be a NNZZTT but a halcone collection, no. OR would be considered NNZZTT under point 3.i instead of 3.f? Clarification is needed</i> - o <i>(l) Private collection of birds. Address in the definition whether in this typology of NZ it is possible to breed for replacement or increase of the collection (neither for profit nor for transfer or exchange purposes)</i>	It has been amended as set out above. It has been amended as set out above. Included.
	Castile and Leon	In relation to section ‘f) Establishments keeping fallow birds, game decoys and pigeons whose activity is colombiculture and colombophilia, provided that they are not sold.’, — Since birds of prey are not ‘hens, turkeys, guinea fowl, ducks, geese, quails, pigeons, pheasants, partridges and ratites (Ratitae)’ (see Part B of Annex I to Regulation (EU) 2016/429), are pet animals registered in the NZR? In order to do so, birds of prey should be included in the positive list of pet animals. With regard to CITES	Has been amended as set out above.

		authorisation, in recent years they have been asked to register as breeding zoos. — With regard to ‘not being sold’, it is proposed ‘not to be placed on the market’, with a twofold objective: or that failure to pay a price does not result in those sales being escaped for consideration but without actual payment of money. or if we talk that the NZT’s ‘aim’ is not marketing, this does not exclude any one-off sale of specimens, which we believe cannot be prohibited. — With regard to section ‘(i) Private collection of birds, housing birds other than those collected as pet animals in Part B of Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, including those intended for shows, races, exhibitions, competitions, breeding, and kept in captivity for reasons other than the production of meat, eggs or products other than meat and eggs.’ - o Revise this wording to take account of the fact that instead of ‘products other than meat and eggs’ it is necessary to put ‘obtaining animals for purposes other than obtaining meat or eggs’, as is the wording of the zootechnical classification ‘Production for other purposes’ in Royal Decree 637/2021. - o Can a private collection not have other livestock species? We already have sub-holdings with the following core classification of livestock species: - o Can establishments now registered as ‘other leisure farms’ if their animals and products do not enter the food chain or are not placed on the market not be covered by this section? In the Autonomous Community of Castile and Leon there are 53 other leisure holdings with more than one livestock species, containing species other than poultry (sheep, alpacas, bovines, equidae, camels, pigs, rabbits, dromedaries, flames, etc.). There are also species other than poultry, such as 14	Partially accepted. Not accepted, there is no need to go into such detail in a basic rule.
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		for bovines, 3 for sheep, 3 for goats, etc.). o Should establishments of bovine animals with bison, if they are reared and marketed, be registered as Breeding production? If yes, can they benefit from the derogation in Article 5 (2) (b) of RD 787/2023? If they do not market but display their animals, must they be authorised under Law 31/2003? Can those in 'Establishments covered by Law 31/2003' only be covered by Article 5 (2) (b) of RD 787/2023.	They will indeed be registered as a zoo or as a holding of production animals.
	Maria Angeles Diaz Rodelgo	Article 3 of the draft, concerning the scope, excludes facilities housing fewer than 10 dogs intended for hunting activities. He calls for this exclusion to be removed or, in the alternative, for all installations to be included in the administrative control system.	Not accepted, it is an appropriate number from a health point of view. For example, in the draft Royal Decree on the NZ of pet animals, this figure is 15 dogs in centres for permanent housing of dogs:
	AGRIFOOD COOPERATIVES	ALTERNATIVE WORDING <i>(c) School farms, understood as establishments open to the public for educational purposes, which keep kept animals other than the pets listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, do not keep live animals of wild species for exhibition and which may keep pets in captivity.</i> The consumption and placing on the market of products of animal origin produced there, including wool, fur or other production of animal origin, shall be prohibited. (d) Refugees of kept animals other than pet animals listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016. These establishments, which shall not under any circumstances have the character of establishments open	It is already envisaged that they cannot take advantage of the production of the animals. This is independent of the need to comply with food safety regulations, especially for medicines, if products are intended for human consumption, but in that case they will be registered in the REGA as a livestock holding, not as a school farm.

		to the public, may be: 1°. Permanent: animals are kept on a long-term basis until death. 2°. Temporary (e) Wildlife recovery centres. The consumption and placing on the market of products of animal origin produced there, including wool, fur or other production of animal origin, shall be prohibited. COMMENTS: On school farms we can also find pets. In both school farms and animal shelters, it should be clarified that the production of these zoological nuclei cannot be consumed or marketed, even if they are considered ‘farms’ in the first case. If they wish to do so, they must register as a farm for own consumption or for reduced consumption with the corresponding REGA code and comply with the requirements laid down in the relevant regulations. These designations cannot be a way for certain farms to avoid compliance with the sectoral regulations. It is particularly important that this is clearly stated as it cannot be exempted from compliance with regulations related to food safety, for example as regards the use of veterinary medicinal products or health control and then put on the market these products.	
	GENERAL COUNCIL OF VETERINARY COLLEGES	Article 3 In the case of zoo nuclei housing livestock species kept for non-productive purposes (e.g. school farms and shelters), the possibility for these animals to be declared as pets and consequently included in the zoo nuclei of pets may lead to interpretation problems and significant differences in the health control conditions and requirements applicable to establishments hosting similar types of animals in practice. Thus, while this project establishes maximum animal capacities and certain specific health conditions, the project for zoological centres for pets does not provide for equivalent limitations.	If a species is included in the positive list of pet animals, the establishments shall be governed by the RD of NZ for pet animals, in accordance with the requirements of Lye 7/2023, and the same shall apply to them as regards animal welfare. A different matter is that the Order implementing this Royal Decree for a given

		As an example of the situations that could arise from considering animals of production species as pets, the regulation of zoo centres for pets currently includes the type of nucleus? Domicilio/Centre for rearing ferrets or other pets? which, in the absence of a clearer delimitation, could lead to those animals being kept in such centres for breeding purposes. It would be appropriate to expressly provide for the possibility of mixed zoological nuclei, in which the health and animal welfare requirements for each species are applied, without generating duplication of administrative burden (it would currently be permitted to have more than one type or category under the same zoological nucleus code, but this increase in administrative and control requirements is taken into account). Or, failing that, consideration should be given to the possibility of allowing the ancillary presence of animals of other species in certain types of zoo nuclei, provided that their number is small and they do not constitute the main activity of the establishment. For example: (c) School farms, understood as establishments open to the public for educational purposes, which keep kept animals other than the pets listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 and do not keep live animals of wild species for exhibition, without prejudice to the fact that they may incidentally house pets when they are part of the educational activity of the centre. (d) Shelters of kept animals other than pet animals listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, without prejudice to the possibility of keeping pet animals as an accessory, provided that they are small and ancillary to the main activity of the centre. These establishments, which shall not under any circumstances have the character of establishments open to the public, may be: 1°. Permanent: animals are kept on a long-term basis until death. 2°. Temporary Article 3. The project does not clearly establish the administrative classification of certain establishments dedicated to the keeping, breeding and reproduction of kept animals, such as ornamental bird breeding (psittacidae, finches,	species will specify the specific animal health requirements for this type of NZ. As regards breeders, the same applies if they are pets and are subject to the welfare rules laid down in Law 7/2023 and in Law 8/2003 on animal health.
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		etc.), bird of prey breeding, reptile breeding or amphibians. It is considered necessary to clarify in the standard the classification applicable to this type of establishment and its inclusion in the rules on zoological centres.	
	GENERAL COUNCIL OF VETERINARY COLLEGES	Article 3 (1) (h) proposes the following wording: <i>“(h) Establishments housing animals used for specific sporting and professional activities and which are of the following species or categories: hunting dogs or ferrets, greyhounds, winter sports dogs, guide dogs, surveillance and security dogs, rescue dogs, assistance dogs, assisted intervention dogs. In all cases, kept in facilities where the number of animals exceeds 10 animals for a single NZT.”</i>	Not accepted, 10 is the appropriate health number.
	GENERAL COUNCIL OF VETERINARY COLLEGES	Article 3 (1) (i) of the project includes within traditional zoological centres private collections of birds kept in captivity for reasons other than food production. However, the scope of the activities permitted in those collections is not specified, in particular in relation to the breeding of animals, the transfer or exchange of specimens, the possible sale of animals. This lack of precision may lead to legal uncertainty and difficulties in distinguishing private collections from establishments engaged in the breeding and/or marketing of animals. It is proposed to incorporate a more precise definition of the concept of private collection that clearly delineates the permitted activities.	It has been amended as set out above.
	ASELCRE	Establishments housing animals used for specific sporting or professional activities shall be classified according to the actual activity carried out, the species housed and the level of concurrent risk, without the mere location at private home or the existence of a numerical threshold being able to operate on their own as a ground for exclusion from the control system.	The health risk has already been assessed, thus setting the maximum numbers provided for in the Royal Decree. A different question is that an administrative rule cannot regulate activities carried out at home, as long as they do not pose a health risk, in accordance with the principle of

			proportionality.
	EXTREMADURA HUNTING FEDERATION	Establish clearly for the establishments listed in Article 3 (f), (h) and (i) that they fall only within the scope of this rule, and that they should therefore only register a traditional zoological nucleus and comply with the established requirements if they exceed 15 animals.	10 is the appropriate health number, 15 is high.
	INTERCIDS	The category structure provided for includes a category of pet animals, specifically in point (h), even though these animals must fall outside the scope of this Royal Decree. In view of all the legal arguments set out above, Article 3(h) (h) should be SUBMITTED.	These animals are not pets according to Law 7/2023.
	FAPAM ANIMAL JUSTICE	It is proposed that Section 1 (d) be amended to include a specific definition of animal sanctuaries, distinct from other types of establishments keeping animals: <i>(d) Sanctuaries: Shelters for kept animals, other than pet animals listed in Annex I to Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, for the care of such animals in distress, raising public awareness and linked to an RAD-type entity, as defined in Law 7/2023 of 28 March on the protection of animal rights and welfare. These establishments, which shall under no circumstances be establishments open to the public, except for awareness-raising and educational activities, may be:</i> <i>1°. Permanent: animals are kept on a long-term basis until death.</i> <i>2°. Temporary</i> Paragraph 1 (h) has been deleted.	We do not accept this, for the reasons set out above, although we accept the reference to awareness-raising activities.
	Animal compassion sanctuary association Animal Protection	These centres (sanctuaries), where the animals remain permanently and without economic destination, form epidemiologically closed units or units with very low interaction with the production system, which significantly reduces their ability to spread diseases compared to conventional livestock farms.	Not acceptable. The necessary health provisions for shelters are already in place.

	Association Saving Bumbled Animals Gaia sanctuary foundation	Proposed amendment: Replacement of paragraph 1.d: <i>“(d) Animal protection Sanctuaries or Zoos:</i> <i>Shelters for kept animals other than those listed in Annex I to Regulation (EU) 2016/429, in which animals of production species that have lost their productive purpose and are not intended for commercial use are permanently housed and have been registered as pets in accordance with Article 34 (d) of Law 7/2023, being linked to an animal protection body of the RAD type.</i> <i>These establishments shall be approved by the competent authority as establishments with a high level of biosecurity and may, depending on their characteristics, be classified as confined establishments in accordance with the provisions of Article 95 of Regulation (EU) 2016/429 and its implementing legislation.</i> <i>In addition, and following an assessment by the competent authority, those establishments shall be recognised as epidemiological compartments, in accordance with the definition laid down in Article 4(29) of that Regulation, provided that they demonstrate the implementation of documented biosecurity, movement control, traceability and health surveillance systems that ensure their effective epidemiological isolation.</i> <i>In such cases, any health incidents that may occur in these establishments may be managed separately, without automatically affecting the health status of the district, province or autonomous community, provided that the conditions that led to their recognition are maintained and that the protocols established by the competent authority are complied with.’</i>	
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	ARRECAL	NNZZTT classification. It is proposed to introduce an explicit reference to packs of hunting hounds. There is also an exception for accommodation where there are fewer than 10 dogs; it is proposed to elevate ESTE UMBRAL to 15 PERROS , in line with the Royal Decree being processed in parallel for pets; with the regional regulations in force on this type of facility in Galicia, Valencia or Catalonia and with the negotiations conducted with MAPA on this subject as early as 2020.	10 is the appropriate number for health purposes.
Article 4. Responsibilities and obligations of NNZZT holders.	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	Add a point 4: Have a veterinarian responsible for the zoo nucleus.	It is a high economic burden, unnecessary in principle, and is not proportionate, especially as it is not required of livestock farms.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	Paragraph 2. <i>'Without prejudice to the obligations arising from the application of the other legislation in force, NNZZT holders must allow official controls to be carried out to verify compliance with this legislation by the competent authority.'</i> It should read <i>'Without prejudice to the obligations arising from the application of the other legislation in force, NNZZT owners must allow unannounced official controls to be carried out to establish compliance with this rule by the competent authority'.</i>	If deemed necessary by the competent authority, checks shall be carried out without prior warning.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The possibility of cross-checking diagnostic test results prior to the adoption of irreversible measures such as the compulsory slaughter of animals should be ensured. The introduction of a confirmatory mechanism using a counterfactual test is a necessary guarantee from the perspective of legal certainty, proportionality of health measures and scientific rigour in veterinary diagnosis. Therefore, the introduction of a procedure that allows for diagnostic confirmation prior to the adoption of irreversible measures is fully consistent with the principles of proportionality, health care and good administration, as well as with the risk-based approach that underpins European animal health legislation. Proposed amendment	It is not accepted. Exceptional and differentiated regimes cannot be established for these NZs in relation to livestock holdings. There is no animal health justification for this. The new paragraph 3 is unnecessary, if the requirements are met they may be authorised as such.

		Article 5. Additional requirements for certain traditional zoological nuclei 1. For NNZZTs classified as sanctuary shelters in accordance with Article 3, if, when the tests referred to in Annex II or the tests established by the competent authority in its surveillance programmes are carried out, the results are positive, Articles 17, 20 and 25 of Law 8/2003 of 24 April shall apply. Animals may be kept with the appropriate veterinary treatment, if necessary, provided that they are diseases for which the national surveillance, control or eradication programme does not require compulsory slaughter and the treatment is not prohibited. 2. Where, as part of the diagnostic tests referred to in the previous paragraph, a positive result is obtained which may lead to the adoption of health measures involving the slaughter of the animals or the adoption of irreversible measures against them, the owner of the traditional zoo may request a contrast test or diagnostic confirmation test. This contrast test shall be carried out: (a) by further sampling or analysis of the preserved sample, where appropriate; (b) in a different official laboratory or in a national reference laboratory, as provided for in European Union legislation on animal health. 3. The competent authority may authorise as a confined establishment those NNZZTs that comply with the requirements laid down in the legislation in force, in accordance with Article 95 and 178 of Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016.	
	AIZA	Coordination of the licensing regime for zoos and aquariums	There is no overlap, these are

		Zoos and aquariums are already subject to a specific authorisation regime under Law 31/2003 of 27 October, which lays down specific requirements, as well as procedures for evaluation and inspection by the competent authorities. In the absence of an express provision for coordination, the cumulative application of the two schemes may lead to: administrative duplication, unnecessary burdens for operators and possible divergences in authorisation criteria. We therefore consider it necessary for the draft to include a provision clarifying the relationship between the two schemes, ensuring proper coordination and avoiding overlaps, so as to enhance legal certainty and ensure that the obligations laid down are applied proportionately.	authorisations that have a different purpose, that of this project is essentially animal health (and also welfare).
	Catalonia. Department of Territori, Habitatge i Ecològic Transicions	<i>"including communications to competent authorities"</i> Does it refer to registration and self-declaration? Not clear Responsibilities for the welfare of animals kept and mandatory veterinary care could be included in this Article as the section dedicated to 'productive' livestock holdings (paragraph (iv) of Article 10 of the Regulation: Operators should be responsible for "proper animal husbandry") basically foresees health and risk issues for farms.	It refers to all types of communications provided for in the legislation, including self-declarations. Compulsory veterinary care is not proportionate, it is not required on livestock holdings.
	ROYAL SPANISH HUNTING FEDERATION	It is proposed that Article 4 (3) of the draft Royal Decree be amended to take account of the unique nature of hunting activity in terms of the possible nature of disqualifications. The current wording provides that the natural person who owns the traditional zoological nucleus (NZT), or who has its effective management, must not be declared legally unfit to exercise the profession, trade or trade in animals or to keep them. However, in the field of hunting packs of hunting hounds, this provision may have effects not provided for by the legislation, in so far as any disqualification may result from infringements or penalties relating to other regulatory areas than animal welfare or handling; to know:	Finding accepted.

		— Hunting rules — Weapons Regulations — Safety compliance in hunts — Public order in hunting activities In such cases, the automatic application of the provision could make it impossible to maintain ownership of the zoo, without there necessarily being a direct link between the cause of the disqualification and the proper management of the establishment or the welfare of the animals. Furthermore, the legislation does not provide for the regime applicable to the zoological nucleus or for the legal status of the animals received in the event of such a ban once the establishment has been authorised, which could create a regulatory gap that would compromise the continuity of the zoological nucleus and the proper keeping of the animals. It is therefore proposed to qualify the wording of Article 4 (3) in order to limit its effects to cases of disqualification directly linked to the welfare, health or handling of animals, and to provide for the possibility of designating a new responsible person or owner to ensure the continuity of the zoo nucleus and the proper care of the animals, especially in the case of packs of hounds or groups of dogs intended for hunting.	
	GENERAL COUNCIL OF VETERINARY COLLEGES	Given that these establishments are home to species that could pose health risks and that the project itself lays down obligations in terms of animal health, biosecurity and animal welfare, it is considered appropriate to include an express reference to the performance of official controls by the competent authority, in order to ensure the correct application of the rule. Add a point on the responsibility of the holder: ‘Owners of traditional zoological centres must allow the official veterinary services to carry out controls and inspections in order to verify compliance with the obligations laid down in this Royal Decree and in the legislation in force on animal health and welfare.’ It is considered appropriate to also include a specific article on official inspections and controls in traditional zoological centres, similar to the one provided for in the draft Royal Decree on zoological centres for pet animals, in order to ensure the	Controls are already foreseen and regulated in Law 8/2003.

		correct verification of compliance with the established obligations on animal health, animal welfare and biosecurity.	
	ASELCRE	Where an establishment involves activities, species or situations that are subject in addition to other sectoral legislation or to the competence of another administrative body, the operator must provide the information necessary to ensure coordination of registration and inspection, without this leading to unnecessary duplication or disproportionate burdens.	If the controls have a different purpose (e.g. CITES control) there is no duplication.
	INTERCIDS	It is proposed that the essential responsibilities of holders be maintained, but it should be clarified that the requirement not to be declared unfit is limited exclusively to prohibitions related to the keeping, handling or professional activity of animals , and that the holder's obligations be interpreted in a coordinated manner with the legislation in force, avoiding duplication and ensuring proportionality and legal certainty.	Finding accepted.
	My friends the pigeons	Testing in animal shelters involving compulsory slaughter will never be the first option and will be double-tested, and permanent quarantine will be considered to explore options beyond slaughter for non-consumer animals. Create a specific health standard to ensure that animals are not killed in sanctuaries.	There are no health reasons for a specific animal health regulation.
	ANPROGAPOR	Adding: <i>As provided for in Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016, holdings shall be subject to a plan for animal health visits, carried out by the farm veterinarian, the frequency of which shall be proportionate to the level of risk of the establishment, and which shall include an assessment of biosecurity requirements and other animal health aspects, such as the rational use of antimicrobials.</i>	The regulation is directly applicable.
	Maxi Lange	We call for the obligations to be applied differently depending on the nature of the centre, adapting them to non-profit entities and	The provision already responds to these considerations.

		ensuring proportionality.	
Article 5. Additional requirements for certain traditional zoological nuclei	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	— Point 2: adding: Commercial breeding of the animals included in the NNZZT 3.1.h requires the corresponding administrative breeder's licence. — Add: <i>NNZZT 3.1a may not carry out activities involving direct contact between wild animals and the public or personnel outside the management of the NNZZT. Wild animals may not leave the cubicles in which they are housed except for veterinary or management reasons. The public or staff not involved in the management of the NNZZT will not be able to access the cubicles in which wild animals are housed.</i> (THIS SUGGESTION COULD ALSO BE INCLUDED IN ARTICLE 11 INSTEAD OF 5)	This provision for a licence is unnecessary. It is accepted, and included in Article 11 (1) (d): 'appropriate handling, which shall include the absence of physical contact of the animals by persons outside the NZT'.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	The words "Animals may be kept with the appropriate veterinary treatment, if necessary, provided that they are diseases for which the national monitoring, control or eradication programme does not require compulsory slaughter and the treatment is not prohibited." Add "In the latter case, review why it is not possible to keep these animals alive, and ensure that systems for slaughter are fully humane".	It is unnecessary, as it is already foreseen that slaughter is not the general rule, but if it is done it will be done using humanitarian methods (Art. 11.3 of the draft).
	Dimitri Nagib Defranc Cevallos	Article 5 should include a paragraph regulating the concept of refugees/sanctuaries or comparable centres, with a regulation specified by MITECO and the Ministry of Social Rights, Consumer Affairs and Agenda 2030. It should consider the typologies of specialised staff, volunteering, financing, aid (such as deductions from the IRFP, specific aid, etc.) for their social and ecological work rather than applying the generic regulations of traditional livestock farming to them.	These are aspects outside the scope of the project.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The inclusion of a provision expressly prohibiting the interaction between wild animals and the zoo public is necessary from an animal and public health perspective, given that wild animals can act as reservoirs of pathogens with zoonotic potential. Direct interaction with the public or unqualified staff increases the risk of disease	Finding accepted.

		transmission, both to humans and to other animals, potentially compromising the biosecurity of the zoo nucleus itself and related livestock holdings. Furthermore, restricting access to cubicles and limiting the handling to authorised personnel are widely recognised basic prevention measures, aligned with the principles of health control and risk reduction in environments where wild animals are housed. Proposed amendment <i>3.The NNZZT referred to in Article 3 (1) (a) may not carry out activities involving direct contact between wild animals and public or personnel outside the management of the NNZZT. Wild animals may not leave the cubicles in which they are housed except for veterinary or management reasons. The public or staff not involved in the management of the NNZZT will not be able to access the cubicles in which wild animals are housed.</i>	
	Castile and Leon	For confinement centres in the case of EU trade, conditions are also laid down in Commission Delegated Regulation (EU) 2019/2035 of 28 June 2019. Article 7 (15) again states: ‘15. NNZZTs authorised as confined or quarantine establishments must also comply with the specific requirements laid down for that purpose in European Union legislation.’ Consider whether your conditions and requirements should be referred to in one single place in the standard.	Unnecessary, EU regulations are directly applicable.
	AGRIFOOD COOPERATIVES	ALTERNATIVE WORDING <i>1. For NNZZT classified as shelters or school farms according to Article 3</i> <i>(a) in the event of suspicion of a compulsorily notifiable disease, action must be taken in accordance with Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health.</i> <i>(b) If, when the tests referred to in Annex II or the tests established by the competent authority in its surveillance programmes are carried out, the results are positive, Articles</i>	Unnecessary, EU regulations are directly applicable.

		17, 20, 22, 23 and 25 of Law 8/2003 of 24 April shall apply. <i>Animals may be kept with the appropriate veterinary treatment, if necessary, provided that they are diseases for which the national surveillance, control or eradication programme does not require compulsory slaughter and the treatment is not prohibited.</i> <i>(c) they must apply the health measures established in accordance with Article 18 of Law 8/2003 of 24 April 2003 on animal health.</i> COMMENTS: This obligation should be extended to school farms when housing domestic animals. In addition, the obligations arising from the health regulations, in particular Regulation 2016/429 and Law 8/2003, should be extended. It is important that the housing of domestic animals and animals that may pose a risk to animal health should be subject to these rules, as should farms producing for own consumption and small farms. Failure to do so would be a comparative disadvantage and would pose a risk to the livestock population as a whole. NEW POINT 3. In the case of shelters or farms, schools that house animals of species that have sectoral regulations at EU, national, regional or local level must comply with all those applicable to them depending on the total number of animals and each species they host, except for aspects related to food safety, specifically: (a) Royal Decree 1053/2022 of 27 December 2007 laying down basic rules for bovine farms. (b) Royal Decree 306/2020 of 11 February 2007 laying down basic rules for intensive pig farms and amending the basic rules for extensive pig farms. c) Royal Decree 1221/2009, of 17 July, laying down basic rules	
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		for the organisation of extensive pig farms and amending Royal Decree 1547/2004, of 25 June, laying down the rules for the organisation of rabbit farms. d) Royal Decree 1547/2004, of 25 June, laying down rules for the organisation of rabbit farms. (e) Royal Decree 637/2021 of 27 July 2014 laying down the basic rules for the management of poultry farms. EXPLANATIONS School farms and zoological centres keeping animals of domestic species that have sector-specific legislation must comply with all the requirements set out therein. It is absolutely unjustified for farms that are smaller than zoological centres and less risky to be subject to this sectoral legislation and for these zoological centres to be exempted. If this were the case, there would be a risk that many of these farms would decide to reclassify themselves in order not to comply with the specific rules. This exemption from liability is an unjustified comparative disadvantage and runs counter to the principle of equality and proportionality with which any legislation must comply.	
	ASELCRE	The measures applicable to the establishments covered by this Article must be adopted in a proportionate, reasoned and coordinated manner with the sectoral legislation in force on animal welfare , taking into account the species, the disease concerned, the level of epidemiological risk and the nature of the establishment.	It is unnecessary, these principles are already laid down, in particular the principle of proportionality, in Law 8/2003.
	INTERCIDS	The standard should require objective, published and verifiable criteria, both for the application of processing and for the authorisation of restrictive measures, ensuring transparency and legal certainty. It is therefore proposed that all treatment and confinement procedures be based on written diagnosis and documented	These aspects of the practical application of the Royal Decree go beyond its character as a basic rule.

		veterinary supervision, eliminating any possibility of unjustified discretionary action.	
	FAPAM ANIMAL JUSTICE	The possibility of cross-checking diagnostic test results prior to the adoption of irreversible measures such as the compulsory slaughter of animals should be ensured. Proposed amendment: <i>'Article 5. 1. For NNZZTs classified as sanctuary shelters in accordance with Article 3, if, when the tests referred to in Annex II or the tests established by the competent authority in its surveillance programmes are carried out, the results are positive, Articles 17, 20 and 25 of Law 8/2003 of 24 April shall apply. Animals may be kept with the appropriate veterinary treatment, if necessary, provided that they are diseases for which the national surveillance, control or eradication programme does not require compulsory slaughter and the treatment is not prohibited.</i> 2. Where, as part of the diagnostic tests referred to in the previous paragraph, a positive result is obtained which may lead to the adoption of health measures involving the slaughter of the animals or the adoption of irreversible measures against them, the owner of the traditional zoo may request a contrast test or diagnostic confirmation test. <i>This contrast test shall be carried out:</i> <i>(a) by further sampling or analysis of the preserved sample, where appropriate;</i> <i>(b) in a different official laboratory or in a national reference laboratory, as provided for in European Union legislation on animal health.</i> <i>2. 3. The competent authority may authorise as a confined establishment those NNZZTs that comply with the requirements laid down in the legislation in force, in accordance with Article 95 and 178 of Regulation (EU) 2016/429 of the European Parliament and of the</i>	We do not accept this, since we have already explained that there are no grounds justifying differential treatment from a health point of view.

		Council of 9 March 2016.	
	ANPROGAPOR	<i>In this regard, it is necessary, in the case of housing livestock species of domestic animals (including the 'Suidae' family), to include the health aspects of Regulation 429/2016 and Law 8/2023, and in particular:</i> Article 5 (1) should provide for: (a) in the event of suspicion of a compulsorily notifiable disease, action must be taken in accordance with Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health. (b) If, when the tests referred to in Annex II or the tests established by the competent authority in its surveillance programmes are carried out, the results are positive, Articles 17, 20, 22, 23 and 25 of Law 8/2003 of 24 April shall apply. Animals may be kept with the appropriate veterinary treatment, if necessary, provided that they are diseases for which the national surveillance, control or eradication programme does not require compulsory slaughter and the treatment is not prohibited. (c) they must apply the health measures established in accordance with Article 18 of Law 8/2003 of 24 April 2003 on animal health. Additionally: Shelters or school farms housing animals of the Suidae family must comply with the requirements on 'Biosafety, infrastructure, equipment and handling conditions' laid down in Article 5 of Royal Decree 306/2020 of 11 February 2007 laying down basic rules for intensive pig farms and amending the basic rules for the management of extensive pig farms.	Unnecessary, regulations and animal health rules are directly applicable.
	Maxi Lange	We call for a distinction to be made between temporary shelters and permanent animal protection centres, for health measures to be	No new categories need to be created.

		adapted to their reality and for proportionality criteria to be introduced.	
	Animal compassion sanctuary association Association for the Protection of Animals Saving Worlds Gaia sanctuary foundation	Proposal for amendment of Article 5 <i>‘Article 5. Additional requirements for certain traditional zoological nuclei</i> <i>1. For NNZZTs classified as animal protection sanctuaries or zoological centres in accordance with Article 3, in the event of positive results in diagnostic tests, the competent authority shall determine the measures to be taken, allowing, in any case, the treatment of the animals provided that appropriate biosecurity conditions are maintained, in accordance with the legislation in force.</i> <i>2. The competent authority may exempt the compulsory slaughter provided for in the national programmes, subject to a health risk assessment, where it is ensured that the animals are not intended for human consumption or moved to livestock holdings, allowing them to be kept under strict physical isolation, biosecurity, movement control and health surveillance measures under official veterinary supervision.</i> <i>3. The competent authority may authorise NNZZT establishments that meet the requirements laid down in the legislation in force as confined establishments, in accordance with Articles 95 and 178 of Regulation (EU) 2016/429.’</i>	We do not accept this, since we have already explained that there are no grounds justifying differential treatment from a health point of view.
Article 6. Conditions on location and health separation.	Susan Bultitude	Hunting dogs should be treated with dignity: they deserve to have their clean and besieged space, to be able to sleep with bed, to receive food and clean water on a regular basis and not to be tied with chain.	There are already several of these requirements, with the exception of the requirement not to be tied with a chain, which are more specific to the development of legislation.
	THE COMMUNITY OF MADRID	<i>1. The competent authority may establish the distances to be respected between NNZZTs or between NNZZTs and other places, in particular livestock holdings keeping epidemiologically related animals, in such a way as to ensure compliance with the legislation in force and to minimise risks to public health, animal health, food safety and the environment.</i>	This is a more specific aspect of the legislative development of the Autonomous Communities.

		Comments: The harmonised minimum distances throughout the national territory for each type of Zoological Number should be established by the competent State Administration.	
	IMIDRA	Article 6 allows the competent authority to establish distances between Traditional Zoological Numbers and livestock holdings. For strategic centres such as CENSYRA, a conflict could arise if Traditional Zoological Numbers were to be located in their surroundings in the future. It might be appropriate to request clarification that pre-existing rules, especially in the case of Official Selection and Reproduction Centres, may not be adversely affected by the installation of a Traditional Zoological Number in its surroundings.	It is an aspect of the regulatory development or application of the rule by the Autonomous Communities, their future capacity to act cannot be limited.
	Official Chamber of Veterinary Surgeons of Murcia	It is considered necessary for Article 6 to specify whether or not municipal conformity is explicitly required for the establishment and registration of a traditional zoo.	This aspect is not covered by the legislation and will depend on the legislation of each municipal entity.
	Dimitri Nagib Defranc Cevallos	A paragraph should be added recognising the uniqueness of refugees/sanctuaries or comparable centres. New rules and training regulated interministerial between the Ministry of Health, MITECO and the Ministry of Social Rights, Consumer Affairs and Agenda 2030 should be established. In addition to the involvement of stakeholders such as Refugees/Sanctuaries or homologable centres, Universities, research centres for animal welfare. In order to recognise the reality of these centres by clearly separating them from the concept of livestock farming and recognising the fit of being sensing and with the right to life, well-being, health, individuality and self-determination of each individual.	It is not accepted, it is unnecessary, this is a standard of animal health and animal welfare, and it is not a question of this standard.
	Balearic island	Article concerned: Art. 6.1 and 6.3. Article 6.1 completely refers the setting of distances to the competent authority of the Autonomous Community. As this is a basic state rule, the absence of minima may lead to an initial regulatory vacuum after entry into force, with risks of implementation/regularisation without homogeneous criteria.	This is a criterion more specific to the development of legislation by the Autonomous Communities, regardless of the fact that the health and zootechnical regulations for each species already lay down distances.

		Application: include basic minimum requirements (even if they are framework) in the Royal Decree and allow the Autonomous Communities to extend them. Drafting proposal (amendment of Art. 6.1 and new Art. 6.1a) <i>'1. The competent authority may determine the distances to be respected. In any event, and as a basic rule, the minimum distances laid down in Annex [new] must be respected, without prejudice to the possibility for the Autonomous Communities to establish higher distances.</i> <i>1 bis. Minimum basic distances for species or categories of NNZZT from epidemiologically related livestock holdings shall be established by regulation or by means of an annex to this Royal Decree, in accordance with health risk criteria.</i>	
	Balearic island	Article 6.3: clarifying the scope and reciprocity of sectoral legislation The reciprocity clause is correct but imprecise: it should be clarified which NNZZT and which conditions are subject to sector-specific regulation, avoiding diverging interpretations. Drafting proposal (amendment to Art. 6.3) <i>3. In the event that sectoral legislation lays down conditions on location and health separation for any of the species kept in the NZT, the provisions of that sectoral legislation shall apply on a reciprocal basis where the NZT maintains species subject to specific sectoral management or health programmes or requirements, in accordance with the terms laid down by the competent authority.</i>	Finding accepted.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The wording of paragraph 5 is too vague, as it is based on open concepts such as 'behavioural needs' or 'environmental enrichment', without setting minimum verifiable criteria. This lack of precision hampers its practical implementation and limits the effectiveness of inspection and control tasks by the administration. In addition, the absence of express prohibitions allows the	The basic legislation must allow the Autonomous Communities a necessary margin of discretion, as they have exclusive competence in matters of animal health and

		persistence of widespread practices that are incompatible with animal welfare, such as the long-term keeping of animals tethered or by means of permanent restraining systems. It is therefore necessary to supplement the wording with a clear and express ban on these practices, avoiding lax interpretations and ensuring uniform minimum standards. In addition, the current wording of paragraph 6 is insufficient as it limits the requirement to protect only from inclement weather and predators, without taking into account other basic needs of kept animals, especially in environments open to the public. In particular, the availability of shelter or shelter spaces that allow animals to withdraw from the public view, reduce stress and develop natural avoidance behaviours is not ensured, which is an essential element for their well-being and adaptation to the environment. It is therefore considered necessary to specify the obligation to have accessible and species-specific refuge areas, allowing animals to isolate visually and physically when required. <i>Proposed amendment</i> <i>5. Animals must be housed in such a way as to ensure their welfare, allowing them freedom of movement and taking account of their physiological and ethological needs in accordance with their species, age and condition.</i> <i>In any case, the keeping of animals tethered or permanently restrained in their housing is prohibited.</i> <i>6. They shall have appropriate facilities or systems in place to ensure protection from inclement weather and predators, as well as refuge spaces appropriate to the species, allowing the animals to be protected, isolated from the environment and, where appropriate, kept out of the public view, according to their species, breed, age and physiological state.</i>	welfare, and it is therefore appropriate to use terms or expressions that do not limit it or make it impossible due to the degree of detail or precision of the basic provisions.
	AGRIFOOD COOPERATIVES	ALTERNATIVE WORDING 2. The distances referred to in paragraph 1 shall be measured on a	It is a specific aspect of regulatory development or

		flat basis (topographical distance) and shall be measured by reference to the place where the animals are housed closest to the facility where the distance is intended to be established, and up to the limit of the strip of the public domain, public easement, limitations or protection, laid down in Articles 13, 14 and 15 of Law 38/2015 of 29 September on the Railway Sector, Articles 28 and 29 of Law 37/2015 of 29 September on Roads, the recast text of the Water Law, approved by Royal Legislative Decree 1/2001 of 20 July, Law 22/1988 of 28 July on Coasts and Law 48/1960 of 21 July on Air Navigation. In addition, the competent authority may, in each individual case, increase or reduce these general minimum distances in accordance with other epidemiological risk factors of the installation, for example the terrain, the orientation of the prevailing winds and the biosecurity conditions of the installations, or after establishing any additional measures it deems appropriate.	implementation by the Autonomous Communities.
	ROYAL SPANISH HUNTING FEDERATION	Article 6.1 The epidemiological link between animals should be defined, even under minimal conditions, in the Royal Decree, in order to avoid different interpretations in the different areas of application. It should also be made clear that the taking into account of distances does not necessarily apply to herds below a certain amount, avoiding very arduous limitations in the face of situations of very low epidemiological or health risk. — Article 6 (2) and (6.3) It is necessary to have a general national framework on location conditions, in order to avoid comparative grievances between Autonomous Communities. It is considered necessary for the Royal Decree to establish homogeneous, flexible, proportionate and real risk based criteria, avoiding the replication of excessively restrictive models that do not correspond to the reality of these facilities or to the objectives of the legislation.	As explained above, the legislation must make it possible for the Autonomous Communities to implement the legislation.
	GENERAL COUNCIL OF	It is considered necessary for Article 6 to specify whether or not municipal conformity is explicitly required for the establishment	It will depend on the regulations of each municipality.

	VETERINARY COLLEGES	and registration of a traditional zoo.	
	ASELCRE	The setting of distances and health separation conditions shall take into account objective and proportionate criteria, based on the species, the authorised capacity, the nature of the activity, the movements into and out, the epidemiological link with other facilities, the biosecurity measures in place and the risks to animal health, public health and the environment.	This is a specific aspect of the legislative development of the Autonomous Communities.
	INTERCIDS	It is proposed that the wording of the article be amended to establish minimum distances and health separation conditions based on objective technical parameters, adjusted to the type of species, the health risk and the size of the zoo nucleus , allowing derogations only where there is documented technical justification, thus ensuring legal certainty and uniformity in the application of the rule.	This is a specific aspect of the legislative development of the Autonomous Communities.
	ANPROGAPOR	4 point to be included: <i>‘By way of exception, and with the corresponding technical justifications, the competent authority may authorise a reduction or increase in the minimum distances laid down in the corresponding planning legislation, prior analysis of the epidemiological risks of the installation, taking into account at least the terrain, the prevailing wind orientation and the biosafety conditions of the installations, and establishing any additional measures it deems appropriate.’</i>	This is a specific aspect of the legislative development of the Autonomous Communities.
	Maxi Lange	It is requested to avoid setting rigid distances at national level and to allow them to be adapted by the Autonomous Communities according to their territorial reality.	This is a specific aspect of the legislative development of the Autonomous Communities.
	ARRECAL	Article 6 (2) is overly complex, as it refers to a total of five different rules for comprehension. This regulatory technique makes the provision virtually unintelligible. As an argument for enabling them to be located close to urban centres, it would make it possible to: regularise dozens of bitches that meet the other requirements in terms of animal welfare and	It is a standard regulatory technique, preferable to setting distances, as distances may change if the reference provisions are amended. With regard to distances, this is a specific aspect of the

		health, training, biosecurity and hygiene; they fail to comply with an abusive distance from population centres. On the other hand, this location closer to the populations facilitates the means of cleaning and disinfection (light, running and hot water, etc.) and reduces the possibility of theft.	legislative development of the Autonomous Communities.
Article 7. General conditions of buildings, installations, biosecurity, hygiene and equipment.	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	— Add in point 3: Cleaning record sheets <i>must be completed to show the cleaning frequency of the facilities where the animals are usually kept. Cleaning of enclosures and removal of faeces shall be done on a daily basis.</i> — Add in point 5: Animals kept outdoors <i>must have a resting or refuge area, with a covered surface and a suitable structure to protect them from inclement weather and direct exposure to the sun and wind. In the case of dogs, access to the outside shall be ensured.</i> — Add a new point 16: <i>Have an emergency plan that includes a list of contingencies that may endanger the safety and welfare of the animals, indicating the protocol for action in each case and the staff responsible for it.</i>	These are aspects more specific to the development of legislation or application of the rule by the Autonomous Communities.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	Paragraph 12. For 'Biocidal, animal and plant health and cleaning products shall be stored in a safe and secure place so that they are not a source of contamination'. Add “Considering that both biocides and plant protection products should not be needed at all, if the animals and their environment are kept in perfect condition”. Paragraph 14. Delete the following statement: ‘The competent authority may exempt individual NNZZT from compliance with some of the above conditions where, due to its type of activity, the competent authority considers that compliance is not possible or not applicable’.	It is extraneous to the project. Not applicable. We do not accept this, and the Autonomous Community should have this possibility, given the many cases that may arise.
	Official Chamber of Veterinary Surgeons of Murcia	Article 7 provides that the materials used in the facilities must be easy to clean and disinfect as far as possible. From the point of view of animal health and biosecurity, the possibility of adequate cleaning	The standard should be possible and reasonably applicable, risk 0 does not exist.

		and disinfection is an essential requirement in order to prevent the transmission of diseases. It is therefore proposed to delete the words “as far as possible” and to establish this requirement as a general obligation. It is also proposed that an additional paragraph be added, worded as follows: ‘Traditional zoological centres must have the health infrastructure necessary for the safe handling of animals and for veterinary interventions, ensuring the integrity and safety of both animals and operators.’	
	AIZA	Implementation of the bird confinement requirement in zoos and aquariums Article 7 (14) lays down the obligation to have facilities that allow the complete confinement of birds for health reasons, or systems that prevent contact with wild birds. However, in the case of zoos and aquariums, this requirement presents difficulties of practical application, as: — many facilities host large and diverse censuses of birds, — and prolonged confinement can have a significant negative impact on animal welfare, especially on species with specific ethological needs. Experience in the management of avian influenza events has also shown that measures should be taken on the basis of a risk assessment, taking into account factors such as: the proximity to outbreaks, the characteristics of the facilities, and the biosecurity measures already in place. It is therefore proposed to: — introduce an express statement allowing compliance with this requirement to be modulated on the basis of a risk assessment carried out by the competent authority, — and that criteria of animal welfare and technical feasibility are taken into account in their application.	Not accepted, such facilities should be available in case a confinement has to be ordered.
	Catalonia. General Direction of Agriculture and Ramaderia	Article 7 (1). instead of “limited area”, it should read “demarcated area”. Article 7.13 does not specify the percentage of nursing capacity, nor whether it should be deducted from the total capacity of the	Finding accepted. This is an aspect of the practical application of the rule.

		NZT or not.	
	Colegio Oficial de Veterinarios de Madrid (Official Veterinary Association of Madrid)	Article 7 General conditions for buildings, installations, biosecurity and equipment <i>3. they must be constructed and maintained using materials which are not harmful to them and which are 'as far as possible' easy to clean and disinfect.</i> It could affect your health and therefore your well-being: delete “as far as possible” and add “if they are not, they must be replaced periodically and must always be replaced if infectious or parasitic diseases are detected”. Keep this section of the draft Pet Royal Decree: ‘The floors must be non-slip, smooth and suitable for supporting the activity of the animals. Porous materials should also be avoided to prevent the transmission of diseases (parasitic for example) <i>4. temperature, relative air humidity and gas concentration “are kept within limits which are not harmful to animals;</i> Change wording: “kept within the limits appropriate to the species” (table may be included in accordance with the rules on animal testing)’	New wording has been added. The standard should be possible and applicable, risk 0 does not exist. Not acceptable. The tables provided for in RD 53/2013 are very specific and it does not seem appropriate to extend them to all types of NZT.
	Colegio Oficial de Veterinarios de Madrid (Official Veterinary Association of Madrid)	Article 7. Paragraph 11. It is proposed to introduce the following amendment consisting of a new paragraph: <i>‘11. There shall be an appropriate place accessible for inspection for the storage of existing veterinary medicinal products and medicated feed in the NZT, in accordance with the</i>	This part of Royal Decree 666/2023 is not accepted.

		<i>provisions of Royal Decree 666/2023, of 18 July, regulating the distribution, prescription, dispensation and use of veterinary medicinal products. Storage sites shall be suitably marked and protected, with physical separation from other substances and products, in such a way as to avoid possible contamination, and shall have appropriate storage systems in place to comply with the manufacturer's conservation recommendations.</i> <i>Medicinal products may be made available to the centre veterinarian and to persons responsible for administering medicinal products only under the express instructions of the veterinarian.'</i>	
	ROYAL SPANISH HUNTING FEDERATION	— Article 7.8 The obligation to have certain reserves or water supply systems permanently available on the premises may be difficult to comply with in this type of establishment, which is often located on rural estates or in ancillary facilities where the supply may depend on external infrastructure. In this regard, it is considered more appropriate to replace the requirement laid down with proof of effective water supply capacity within a given period, using verifiable means. To this end, it is proposed that the Article provides as a valid alternative for the accreditation of a guaranteed supply system within a specified maximum period (e.g. by contract with water tank services, agreements with approved suppliers or other equivalent mechanisms), provided that sufficient water is available to meet the animals' needs within a reasonable time. This amendment would ensure animal welfare and continuity of supply without imposing disproportionate or hard-to-apply requirements in rural facilities linked to traditional activities such as packs of hunting hounds. — Article 7.10 It is proposed to revise the wording of Article 7 (10) in order to adapt its content to the reality of certain traditional zoological centres, including packs of hounds or groups of dogs intended for hunting.	The possibility of derogating from the general requirements has been specified for those aspects where it seems more appropriate to leave a margin of discretion to the competent authorities, in view of the variety of cases that may arise (this certainly does not seem to be the case with the requirement of availability of water, which is essential for all living). In this sense, it would be counterproductive with the character of a mandatory rule to provide for regulation in order to subsequently allow the implementer of the rule to fully derogate from its application in certain cases, for which purpose no regulation would be established and the result would be the same.

		The provision contained in this section, relating to the adoption of specific measures linked to the transit or handling of staff between facilities, is difficult to apply in the case of packs of hunting hounds, since in most cases they are facilities managed directly by their owner or by a very small number of persons with no formal employment relationship or usual transit between different zoological centres. The imposition of such measures across the board may be disproportionate to the real health risk in this type of establishment. It is therefore proposed to introduce an exception for those traditional zoological centres that do not have contract staff or whose management is exclusively the responsibility of their owner, and to limit the application of these obligations to cases where there are staff providing services on a regular basis in different zoological centres (as could be the case for certain veterinary professionals) where there are circumstances justifying the adoption of additional biosecurity measures. Article 7.14 The uniqueness of zoological centres housing packs of hunting hounds is evidenced by the numerous nuances made to Article 7 on general conditions of buildings, installations, biosecurity, hygiene and equipment. In that regard, it is proposed that the exception provided for in the article, concerning the possibility for the competent authorities to exempt certain NNZZTs from the general conditions where their type of activity considers that compliance with them is not possible or is not applicable, be extended unequivocally to all the headings and paragraphs of Article 7.	
	GENERAL COUNCIL OF VETERINARY COLLEGES	From the point of view of animal health and biosecurity, the possibility of adequate cleaning and disinfection is an essential requirement in order to prevent the transmission of diseases. It is therefore proposed to delete the words “as far as possible” and to establish this requirement as a general obligation. It is also proposed that an additional paragraph be added,	It is not accepted for the reasons already explained – As regards adequate lighting, it is a specific aspect of regulatory development or implementation, and will depend on the species of

		worded as follows: <i>‘Traditional zoological centres must have the health infrastructure necessary for the safe handling of animals and for veterinary interventions, ensuring the integrity and safety of both animals and operators.’</i> Add also appropriate lighting.	(birds, for example).
	ASELCRE	The requirements laid down in this Article shall be applied on the basis of the real risk, the species, the activity carried out and the material conditions of the establishment , without the location, name or organisational modality alone being able to justify a structural reduction in the level of biosafety, hygiene, animal welfare or administrative control.	Not accepted, requirements should apply <i>per se</i> .
	INTERCIDS	It is proposed to amend the article to make the requirements clear, proportionate and measurable, establishing separate obligations and recommendation criteria, so as to ensure animal protection and biosecurity , while avoiding disproportionate burdens or arbitrary interpretations by the competent authority.	The rule is clear, always considering that the necessary scope for regulatory development should be left to the Autonomous Communities.
	ANPROGAPOR	Article 7 (2). Point 2 should apply not only to captive birds. It needs to be extended to all other domestic species (including the ‘Suidae’ family) and therefore all NZTs with domestic species need to have effective systems in place to protect animals from contact with wild animals that can transmit diseases. In particular, openings outside buildings unsuitable for the transit of vehicles, persons or animals, including windows and vents, shall be covered with a mesh net that prevents access by other birds. In addition, add the following points: <i>‘16. They must have a perimeter fence or insulation or equivalent system in good condition, which isolates the holding from outside and includes all areas likely to be used by the animals. Where animals have access to the outside, the space</i>	These are aspects of the practical application of the standard or its development, such a degree of detail cannot be found in a basic standard.

		<i>where the animals are housed must be fenced or saddled to prevent human entry and contact with wild animals.</i> 17. They must have permanent facilities, isolated from the outside, for housing all the animals on the holding, in accordance with the maximum capacity recorded. 18. Openings outside buildings that are not suitable for the transit of vehicles, persons or animals, including windows and vents, shall be covered with a mesh net that prevents access by birds. 19. Access to the holding shall be closed, with a footbath or any other means of efficiency similar to the entrance to the enclosure. The entry (s) shall be kept permanently closed, except when used for the entry or exit of authorised personnel or vehicles. 20. Visits should be restricted to what is strictly necessary. Holdings must keep an up-to-date register of vehicles and persons visiting the holding, including veterinarians. 21. Farms must have clothes, shoes and equipment for exclusive use within the housing of the animals. 22. Holdings must have adequate hygienic and sanitary conditions. 23. They shall be provided with veterinary advice.”	
	Maxi Lange	The requirements are considered to respond to production models and we request that they be adapted to the real risk, differentiating between types of centres and avoiding disproportionate burdens.	The provision already responds to those considerations.
	Animal Compassion Sanctuary Association	Proposal to amend Article 7. <i>Article 7. General conditions of buildings, installations, biosecurity, hygiene and equipment.</i>	There are no health reasons that would justify differential treatment for animal shelters.

	Association for the Protection of Animals Saving Worlds	14. <i>In the case of establishments where birds have continuous access to open air, there must be an area that allows them to be completely confined for health reasons or protection networks or other appropriate systems must be in place to prevent direct and indirect contact with other birds. Such a facility must ensure that contact with wild birds vectors of disease transmission is avoided at all times.</i> <i>The competent authority may exempt individual NNZZT from compliance with some of the above conditions when, due to their type of activity, it considers that compliance is not possible or applicable, especially in the case of animal protection sanctuaries or zoological centres, applying structural and functional flexibility criteria that allow the biosecurity requirements to be adapted to the characteristics and real risk of the installation.</i>	
	ARRECAL	Article 7.4. The wording should be amended. Heat waves occur in Spain in summer and can reach very high temperatures. As the provision is worded, it could be interpreted as requiring general air conditioning, which is economically unacceptable for the vast majority of owners of packs of hunting hounds in our country. It is proposed to make its content more flexible, taking into account the climate characteristics of the peninsula. By way of example, that obligation is not laid down in the technical rules governing buildings for the construction of nursery schools or kindergartens.	The wording is general and does not require air-conditioning systems.
Article 8. Record book.	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	Paragraph 3. Delete the following statement: “The competent authority may exempt certain NNZZT from the requirement that the register contains all or some of the information listed in Annex III, either because of the type of activity or because the holder has access to computerised databases and is able to update the required information in those databases.”	It is not accepted, it should be possible for the competent authority to have a margin of manoeuvre, depending on the specific case.
	Barcelona Chamber of Veterinary Surgeons	ARTICLE 8 ON THE REGISTER BOOK Each NZT should have a professional veterinarian to advise the animal owner on animal welfare and health, biosafety, hygiene and veterinary medicines. That professional shall carry out animal health	The obligation to have a veterinarian cannot be laid down in legislation with the status of a royal decree, and

		visits to verify effective compliance with the requirements laid down in Articles 5, 7 and 9. The project should include the procedure for the appointment and change of the professional veterinarian, as well as the requirements for appointment (membership of a professional association, specific training), which can be proven by the submission of a declaration of responsibility from the holder of the NZT containing the identification details and the membership number indicating the province of the veterinary services. It is proposed to include a new paragraph 4 to Article 8 of the draft: <i>“4.- the register shall contain the identification data and the registration number indicating the Province of the veterinary services, as well as a declaration of responsibility by the holder of the NZT for his designation or removal.”</i>	the proposal is, moreover, a specific aspect of the development of legislation if the communities deem it appropriate (regardless of the fact that the veterinarian may not be the same, change, etc.).
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The regulation of the logbook is insufficient to ensure proper traceability of the animals and effective control by the administration. The absence of specific requirements as regards individual identification, updating of data and the official nature of the register may make it difficult to detect irregularities and limit the effectiveness of inspection work. Furthermore, the foreseen shelf-life is considered insufficient, especially in an area where traceability of animals and activities in the zoo is essential for administrative and health control. It is therefore considered necessary to strengthen the obligations relating to the content, updating, validity and conservation of the register. Proposed amendment: <i>The holder of the NZT must keep an up-to-date official register of the zoological centre, known as the ‘register’, which must be completed by the competent authority.</i> <i>This book must, in any event, show the individual identification of each animal by means of its identification number in accordance with the legislation in force, and it must be identified at the time of its entry into the centre if it is not</i>	These are aspects that are too specific in a basic rule (the diligence of the book, for example, is not required on livestock production holdings).

		<i>previously identified.</i> <i>The register must be kept up to date, with a maximum of 24 hours from entry, exit or any relevant modification concerning the animals.</i> <i>The register shall be kept manually or in computerised form and shall be accessible at all times to the competent authority.</i> <i>The information contained in the logbook must be kept for a minimum period of five years, including in the event of a change of ownership of the zoo or a temporary or permanent cessation of activity.</i>	
	Regional Government of Valencia	In this Article, in conjunction with Annex III, it should be borne in mind that Royal Decree 787/2023 regulates the system for the identification, traceability and registration of bovine, ovine, caprine, porcine, equine, camelid, cervid, poultry, leporidae and fur species, bees and psittacidae in Spain. Annex V lays down the minimum content of the book, which does not include the register of treatments that it interestingly includes in the register of settlements. traditional zoos. It is proposed that poultry holdings with captive birds of colombophilia and colombiculture be exempted from the aforementioned register because we do not find a logical justification for the very exhaustive content of the holding register in Annex III. It should not have an individualised record of entries and exits and exits of birds that do not provide any epidemiological evidence in free-flown birds outside. It is a heavy bureaucratic burden. In some points of Annex III, such as point 12 (a) (b) (c), it is unrealistic to justify any isolated death of a pigeon with the date, cause, veterinary report and in the case of active veterinary euthanasia and the method used when there are daily casualties on poultry holdings and agonising by the farmer and only one count is required.	It is not accepted that, for the purposes of measures to prevent and combat antimicrobial resistance, it is necessary to know all treatments in all animals. There is no health reason to exempt these birds from, for example, isolation facilities in the face of health situations such as the recent one caused by AI. Some aspects of Annex III are deleted as they may indeed represent an unnecessary burden.
	AIZA	Adaptation of the logbook to zoos and aquariums Article 8 regulates the obligation of traditional zoological centres to	Not accepted, depending on the systems of each zoo and

		keep a register, including the possibility of exempting certain data according to the type of activity or the use of computerised databases. In the case of zoos and aquariums, this regime poses a number of challenges: — These establishments manage complex, multi-species species plans, with a high number of animals and frequent movements. — They usually have advanced computerised management systems, including international databases (such as 360/ZIMS species), containing detailed information on animal identification, health, movements and genealogy. — The requirements laid down in Annex III may not be adequately aligned with these systems, leading to administrative duplication or the need to adapt the information to formats not designed for such establishments. Furthermore, the derogation provided for in the last paragraph of Article 8 is too general and discretionary, which may lead to uneven implementation by the competent authorities. It is therefore proposed to: expressly recognise the validity of the computerised systems used by zoos and aquariums, and provide that zoos and aquariums may replace the register provided for in this Royal Decree, provided that they contain equivalent information.	aquarium, and on the judgement of the competent authority, which cannot be circumvented by a basic standard.
	Catalonia. Department of Territori, Habitatge i Transicions Ecological Transitions	<i>1. The housing of animals shall not restrict their freedom of movement in a manner that does not cause them unnecessary suffering or harm and shall take into account their behavioural needs.'</i> Delete “do not cause them unnecessary suffering or harm” and only indicate in a way that their behavioural needs will be taken into account as promoting their well-being is already implicit in not causing them harm <i>6. They shall have appropriate facilities or systems in place to ensure protection from inclement weather and predators according to their species, breed, age and physiological state.</i>	Not acceptable. The rule should leave a margin of discretion to the competent authority.

		Include also what is referred to in the draft Royal Decree of NZ for pet animals: <i>Animals kept outdoors must have a resting or refuge area, with a covered surface and a suitable structure to protect them from inclement weather and direct exposure to the sun and wind.</i> <i>8. Have a water storage system ensuring an autonomy of the network of at least 48 hours, or other system ensuring an equivalent supply.</i> Adding: “While preventing deterioration in water quality (algae develop in the case of translucent deposits in summer)” <i>13. There shall be a specific and exclusive area for the observation and isolation of animals which, for reasons of animal health or welfare, must be removed from the rest for an extended period of time.’</i> Refer to the need for quarantine at the entry of the animals.	This is an aspect of the regulatory development of the Autonomous Communities, and will depend on each case (e.g. it does not seem appropriate in livestock custody dogs). Not accepted, it is a specific aspect of the application of the rule. Not accepted, depending on the applicable sectoral regulations according to the species.
	ROYAL SPANISH HUNTING FEDERATION	Article 8.3 The provision states that the competent authority may exempt certain traditional zoological centres from the obligation for the register to include all or some of the data listed in Annex III, depending on the type of activity or access to computerised databases. In this regard, it is considered necessary to expressly strengthen that possibility of derogation, in particular for dog establishments kept for hunting purposes, where the administrative burden resulting from the fulfilment of the various documentary obligations may be clearly disproportionate. It is proposed that Article 8 (3) be amended to expressly include the following wording: <i>“The competent authority may exempt certain</i>	Not accepted, depending on the systems of each NZ of game animals and the judgement of the competent authority, which cannot be circumvented by a basic standard.

		<i>NNZZTs from the requirement that the register must contain all or some of the information listed in Annex III, either because of their type of activity or because their owner has access to computerised databases and is able to update the required information in those databases. Specifically, establishments of auxiliary game animals with an annexed cleaning and disinfection centre and approved means of transport are exempted from the recording of Annex III data."</i>	
	GENERAL COUNCIL OF VETERINARY COLLEGES	The project should include the procedure for the appointment and change of the professional veterinarian, as well as the requirements for appointment (membership of a professional association, specific training), which can be proven by the submission of a declaration of responsibility from the holder of the NZT containing the identification details and the membership number indicating the province of the veterinary services. It is proposed to include a new paragraph 4 to Article 8 of the draft: "4.- the register shall contain the identification data and the registration number indicating the Province of the veterinary services, as well as a declaration of responsibility by the holder of the NZT for his designation or removal."	This is an aspect of the practical application of the legislation or its development by the Autonomous Communities that they consider appropriate.
	ASELCRE	The register must permit the traceability of entries, exits, health incidents and changes in the classification of the establishment and must be coordinated with any other sectoral registers applicable on account of the species, activity or regulations involved.	This wording does not add anything because it is generic.
	INTERCIDS	It is proposed that the article be amended in order to specify objectively the minimum data to be recorded in all the NZTs; establish uniform criteria on the form, periodicity and retention of the register ; and to limit derogations only to technically justified cases, avoiding discreet or ambiguous criteria.	The basic rule should allow adequate scope for regulatory development and implementation by the Autonomous Communities.
	Maxi Lange	We call for registration obligations to be simplified, compatible with existing systems and adapted to non-profit centres.	The project is appropriate in these terms.
	ARRECAL	Record book . Many of the envisaged obligations already exist today. However, administrative simplification would be desirable.	The rule already makes it possible for the Autonomous Communities to make the

		It should be borne in mind that many packs of hunting hounds are not professional and that the regulatory burden is very high. It is therefore proposed to make these obligations more flexible and simpler. In the case of 'dog establishments kept for hunting purposes'; they have an annexed cleaning and disinfection centre and authorised means of transport, and the bureaucratic burden will be very heavy, with duplicate information (taking into account their secondary or strictly playful economic activity of their owner), as they must already have a cleaning and disinfection centre book and a transporter's book; in addition to individual identification by passport or ANIMAL HEALTH CARTILY (health document which already contains most of the information contained in Annex III of the draft). Decree 181/2009 of 20 October 2015 of the Government of Aragon regulating zoological centres in the Autonomous Community of Aragon; it contains exceptional provisions in this regard. On the other hand, as the registers show, they keep personal information. It is therefore necessary to introduce a safeguard clause to protect such data in accordance with the existing data protection rules at any given time.	appropriate exceptions. With regard to personal data, the Administration processes and manages them with a legitimate interest within the meaning of Article 6 (1) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.
Article 9. General conditions on handling, management and animal welfare.	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	Point 1: add: For water: <i>They must have clean and fresh water ad libitum and a sufficient number of feeders and drinkers arranged in such a way as to avoid competition and to be accessible to all individuals. In the case of conventional drinking troughs, it shall not be possible to tip them over. Pup drinkers shall be shallow to facilitate access and avoid accidents or drowning.</i> — Add in point 3: <i>In order to minimise stress to the animals, adequate distribution of the spaces in the centre must be established and, where animals of different species are housed, they must be arranged in such a way that they cannot interact with each other, unless their physical conditions and behaviour allow them to live together in a way that guarantees their integrity and physical and mental well-being.</i> — Add in point 8: <i>Cleaning of enclosures and removal of faeces shall be done on a daily basis.</i>	These are aspects specific to the development of legislation or the application of the rule by the Autonomous Communities, given their degree of specificity.

		— Add a new point: <i>Spaces intended for housing animals shall be provided with natural or artificial lighting, respecting the periods of light and darkness appropriate to the biological and ethological needs of each species. In any case, they must be provided with an artificial light source to enable the installations to be inspected at night. Without prejudice to the previous paragraph, dogs must be exposed to light for at least 7 hours a day and have the possibility to be without artificial light for at least 8 hours a day.</i>	
	Susan Bultitude	Hunting dogs should be treated with dignity, with their sleeping bed, and strictly cleaned of the pipi or caca area, where I sleep.	These are aspects specific to the development of legislation or the application of the rule by the Autonomous Communities, given their degree of specificity, apart from the use of scatological terminology unsuited to administrative law.
	Regional Government of Valencia	According to which type of holdings it is not feasible to require them to comply with paragraphs 6, 8 and 9. It is proposed to add the following text: 'The competent authority may, taking into account the type of activity, exempt certain NNZZT from compliance with the conditions laid down in Article 9 (6), (8) and (9).	There is no health reason to exempt certain holdings from generic and mostly already required requirements under existing sectoral legislation, such as in the case of ABP.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	Paragraph 7. The words <i>'The person designated for this purpose by the owner of the NZT shall review the condition of the animals at least once a day and, if any of them appear ill or injured, the veterinary professional providing their services in the establishment shall be contacted and shall ensure that they receive immediate care. Surveillance may be carried out by telematic means, provided that a record of the relevant records is made available to the competent authority.'</i> It should be added that <i>'The person designated for this purpose by the owner of the NZT shall review the condition of the animals at least once a day and, if any of them appear ill or injured, the</i>	It is not accepted that veterinary staff may also be dependent on employment, without this prejudging the impartiality of their actions and their full subjection to the <i>lex artis</i> .

		<i>veterinary professional providing services in the establishment shall be contacted, who shall be completely disconnected from the business and completely impartial and independent, and shall ensure that he or she receives immediate care. Surveillance may be carried out by telematic means, provided that a record of the relevant records is made available to the competent authority."</i>	
	Balearic island	Article 9.7: daily review not feasible in extensive form; adapt to handling system The 'at least once a day' requirement may be impossible to meet in extensive farming (permanent equine shelters in large areas, mountain areas), without providing a proportional increase in welfare if other surveillance systems are in place. Drafting proposal (amendment to Art. 9.7) 7. <i>The designated person shall review the condition of the animals at a frequency appropriate to the management system (intensive/extensive) and the species, ensuring in all cases the early detection of signs of disease or injury. Monitoring may be carried out electronically (the rest of the paragraph is maintained).</i>	Not accepted, there is no justified reason to waive this requirement, it is only accepted for livestock protection or custody dogs on extensive farms in mountainous or hard-to-reach areas, where the frequency of the visit will correspond to that of the animals kept.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	- o The current wording of paragraph 1 sets out the obligation to provide adequate nutrition, but does not specify who should determine the nutritional criteria applicable in each case. - o Given the diversity of species, ages and physiological states present in zoological nuclei, it is necessary that the definition of diet and quantities be based on qualified technical criteria. In this regard, the intervention of the veterinarian responsible is an essential guarantee to ensure adequate nutrition, prevent associated pathologies and strengthen health control of the zoo nucleus. As regards paragraph 3, the wording of the provision is excessively open and based on indeterminate concepts such as 'appropriate conditions' or 'sufficient space', without establishing objective criteria or verifiable minimum parameters. This lack of clarity creates legal uncertainty and makes it	These are aspects specific to the regulatory development of the Autonomous Communities. Furthermore, the establishment of appropriate feeding cannot be limited to that decided by a veterinarian alone, and it is not necessary to specify what should be stated in the clinical record of the animal.

		significantly more difficult for the administration to carry out checks and inspections, as its interpretation is subject to subjective assessments. Furthermore, the absence of a clear reference to technical criteria or standards of application makes it impossible to ensure that the rule is applied uniformly, potentially leading to different situations between centres and limiting the effectiveness of the protection regime provided for. o With regard to paragraph 7, the current wording is insufficient as it allows monitoring by telematic means, which may compromise the effective detection of incidents both on animals and on the premises. Certain situations, such as faults in drinking troughs, behavioural alterations or mild clinical signs, may not be detectable through remote systems, requiring in-person supervision to ensure adequate control. It is also considered necessary to strengthen the registration obligations for these reviews, establishing a documented, complete and verifiable system that enables the competent authority to verify the correct monitoring of the condition of the animals and the facilities. Furthermore, a clear distinction should be made between the daily event record and the veterinary clinical documentation, which should be included in the individual animal history. Proposed amendment: <i>1.The animals must be fed in sufficient quantity and quality, appropriate to their age, species and physiological state, to ensure and maintain their good health and to meet their physiological needs.</i>	
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		<i>It will be the responsibility of the zoo veterinarian to establish the most appropriate feed for each animal, as well as the daily quantities to be supplied, in accordance with technical and health criteria.</i> <i>3. The management of facilities, health conditions and the handling of animals must ensure their welfare in accordance with objective and verifiable technical criteria, based on pre-established scientific standards and protocols.</i> <i>In particular, it must be ensured that sufficient space and appropriate conditions are available in accordance with minimum parameters defined by regulation [definition to be included in this regulation] for each species, age and physiological state, enabling them to be assessed by the competent authority.</i> <i>7. The person designated by the holder of the NZT must carry out daily on-site monitoring of the condition of the animals and the facilities.</i> <i>In the event of any animal showing signs of disease or injury, the responsible veterinary professional shall be contacted immediately and shall ensure appropriate health care.</i> <i>Daily reviews shall be recorded in a log book, by means of signed annotations, which shall include at least: the date, the areas of the facility reviewed (including accommodation, feeders and drinkers), the condition of the animals, the incidents detected and the actions taken.</i> <i>Monitoring by telematic means may only be complementary and under no circumstances replace daily face-to-face monitoring.</i> <i>Veterinary actions, diagnostics and treatments shall be recorded in the individual clinical history of each animal.</i>	
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	Catalonia. General Direction of Agriculture i Ramaderia	Article 9.4: add regular “disinsectisation”.	Depending on each NZT, it seems more appropriate for it to be given concrete expression in the development of legislation.
	Catalonia. Department of Territori, Habitatge i Ecological Transitions	Include a point referring to the fact that the water must be adequately protected from cold outdoors to prevent it from being watered. Article 9.2. Prevent access to ‘harmful’ animals or pests (mainly insects and rodents) Article 9.3. For NNZZTs housing dogs or ferrets, they must comply with the provisions included in Annex I (points A and C) to the draft Royal Decree on NNZZ for pet animals. Article 9.4 The removal of faeces must take place on a daily basis and facilities and containers must be cleaned on a daily basis: if the periodicity is not established, it may affect the health and therefore the welfare of the animals (disinfection may take place on a regular basis) Article 9.7: “if any person appears ill or injured” should be replaced by “if symptoms of illness or injury are detected”. ‘the veterinary professional providing services in the establishment shall be contacted and shall ensure that he or she receives immediate care.’ the person responsible for ensuring that he or she receives the care is the owner and not the veterinarian: replace “which” with “and”. Surveillance may be carried out by telematic means provided that ‘the facilities ensure a complete view of the animal at 24 hours a day and’ (add) records are made available to the competent authority. Article 9.8. They must have a waste water collection system or connection to the public sewerage network (at least from a certain capacity and assuming that they are not extensive species).	These are specific aspects, and it seems more appropriate for them to be given concrete form in the development of legislation. We agree to specify that it is the owner of the centre, not the veterinarian, who ensures that the necessary care is taken, deleting this reference.

	AGRIFOOD COOPERATIVES	ALTERNATIVE WORDING. NEW POINTS <i>10. In the case of shelters or farms, schools keeping animals which have Community or national rules on the protection of animals must comply with the parameters laid down in those rules.</i> <i>11. In the case of school shelters or farms, manure and slurry shall be managed in accordance with the relevant sectoral regulations, such as those laid down in environmental legislation regarding the management of these by-products, including Royal Decree 261/1996 of 16 February 1997 on the protection of waters against pollution, which must calculate the nitrogen content of manure using or Royal Decree 1051/2022 establishes rules for sustainable nutrition in agricultural soils in Spain, regulating nutrient inputs and fertiliser management to reduce environmental impacts and greenhouse gas emissions.</i> EXPLANATIONS The rules on the protection of animals and the environment must be applied in these zoos in the same way as in farms of the same size. Taking into account the objective of animal protection and education that these centres have, there is no justification for not considering this. Furthermore, as stated above, it represents an unjustified comparative disadvantage compared to small farms which are obliged to comply with it.	It is unnecessary to specify that the other applicable legislation will be complied with.
	ASELCRE	The health and hygiene requirements laid down in this Article shall be imposed on the basis of the real risk, the species and the activity actually carried out , and the mere designation, location or functional classification of the establishment cannot in itself justify a structural reduction in the level of requirements.	The requirements are generally complied with.
	INTERCIDS	Amend the article to specify welfare and handling standards in a measurable and objective way, establishing clear monitoring and control criteria, differentiating what is mandatory from technical recommendations , thus ensuring consistency with the	These are aspects specific to the implementation of legislation by the Autonomous Communities.

		general purpose of the Royal Decree and legal certainty.	
	Maxi Lange	Flexible application of the conditions is requested, especially as regards access for volunteers and visitors to animal protection centres.	The standard allows this when this does not pose a health risk.
	ARRECAL	Article 9. General conditions on handling, management and animal welfare. It is proposed to delete the obligation to review the condition of the animals on a daily basis provided for in Article 9 (7), as it is excessive and does not reflect the reality of this activity. Furthermore, Article 9 (9) refers back to a European regulation, which again makes it difficult for the addressees to understand the obligations.	A new, more adapted wording has been added, in line with the response to the same observation from the Balearic Islands.
Article 10. Staff training.	THE COMMUNITY OF MADRID	Delete paragraph 3. <i>'In addition, the holder shall ensure that those persons carry out, on a regular basis and in any event at least once every five years, courses to adapt the knowledge to technical progress or new developments in the legislation relating to the activity, with a minimum duration of 8 hours.'</i>	Not accepted, training should be regularly updated.
	Artemisan Foundation	The staff training regime is formulated in a generic way, which is appropriate in a basic standard. However, objections should be raised against the temporary nature of authorisations or accreditations, especially when a limited duration is established (paragraph 3), as this may create unnecessary administrative burdens. It is therefore proposed that paragraph 3 be amended to establish permanent accreditations, subject only to training updates where necessary.	Article 10.3 establishes a frequency of refresher training that is deemed appropriate (every 5 years) as a maximum, in order to establish a common criterion at national level.
	Colegio Oficial de Ingenieros de Montes (Official College of Forestry Engineers)	Proposal for Article 10 (4) <i>'A bachelor's degree in veterinary medicine, biology, marine sciences, environmental sciences, forestry engineering and other higher qualifications that include specific training in wildlife management, animal health or hunting management, in addition to the corresponding or equivalent professional training courses, shall be considered to be qualifications authorising, at the request of the persons concerned, the pursuit of the activity described in point 2, provided that they are adapted to the classification of the NZT and that it is justified that the curriculum of</i>	Partially. Royal Decree 1456/1990 of 26 October 2007 establishing the official university diploma in forestry engineers and the general guidelines for the curricula leading to that diploma do not include training in animal health or hunting management (management of wild fauna), so it does not seem appropriate to

		<i>the studies carried out includes the training, syllabus and duration referred to in this standard or equivalent.'</i> The exclusion of woodland engineering and other qualifications with specific training in wildlife management or environmental health introduces an unjustified limitation that does not meet criteria of technical capacity or functional suitability.	include it.
	Dimitri Nagib Defranc Cevallos	Add a new paragraph (possibly 10.3) establishing the creation of training specialties, scholarships, official aid for handling rescued or recovering fauna in Shelters/Sanctuaries or accredited centres, as these require skills other than those of livestock production. In addition, it should include the promotion of FUNDAE style courses to facilitate this training and support for centres by trained workers.	It is not the subject of this regulation.
	Barcelona Chamber of Veterinary Surgeons	Article 10 (4) States that NNZZTT staff may be trained by holders of university qualifications in veterinary medicine, biology, marine sciences, environmental sciences and even vocational training courses. However, in the light of the matters set out in Annex IV, which include, inter alia, the following: animal health, hygiene, resistance to antibiotics, food, breeding or ethology, the trainers must first have obtained the knowledge leading to the award of the Diploma or Degree in Veterinary Medicine regulated in Royal Decree 1384/1991 and Order ECI/333/2008, of 13 February, laying down the requirements for the verification of the official university diplomas authorising the exercise of the profession of Veterinary Medicine. For the reasons set out above, it is proposed that Article 10 (4) be worded as follows: <i>'A degree or degree in veterinary medicine, biology, marine sciences, environmental sciences and the corresponding or equivalent vocational training courses shall be regarded as qualifications authorising, at the request of the persons concerned, the pursuit of the activity described in point 2, provided that they are adapted to the classification of the NZT and that it is justified that the curriculum for the studies carried out includes the training, syllabus</i>	It is not accepted, Article 10.4 does not refer to qualifications that formally entitle NZT staff, but to qualifications that in themselves already allow them to practise as NZT staff.

		<i>and duration referred to in this legislation or equivalent.'</i>	
	ELEVEN FOUNDATION OF THE GUIDE DOG	As stated in Article 5 of Royal Decree 409/2025 of 27 May 2014 regulating the activity and welfare of assistance dogs: Article 5. Training of the assistance dog. 1. Assistance dogs shall be trained for the performance of their duties by autonomous entities or professionals specialised in education, socialisation and training of assistance dogs, and accredited or recognised by the Autonomous Communities and the cities of Ceuta and Melilla. 2. The Autonomous Communities and the cities of Ceuta and Melilla shall determine the conditions that training bodies must meet in order to be accredited or recognised, as regards professionals, technical conditions and, where appropriate, appropriate facilities and services for the training, delivery and follow-up of assistance dogs. The application of the general regime for pet dog handlers to assistance dog handlers is not justified because assistance dogs have their own special regime, regulated by regional rules. We understand that the qualification regime for the responsible persons and professionals of the entities involved in the training of assistance dogs should be preserved, and that it should continue to be governed by the regulations approved by the competent administration and be in line with the provisions of the international standards of IGDF and ADI. Therefore, in assimilation with the qualifications required to carry out the activities inherent in the education of pets, training of assistance dogs should be excluded, which will be governed by the specific legislation applicable to it approved by the competent administration. It is therefore proposed that it be worded as follows: <i>4. A degree or degree in veterinary medicine, biology, marine sciences, environmental sciences and the corresponding or equivalent vocational training courses shall be considered to be qualifications authorising, at the request of the persons concerned, the pursuit of the activity described in point 2, provided that they are adapted to the classification of the NZT and that it is justified that the curriculum for the studies carried out includes the training, syllabus and duration referred to in this standard or equivalent. With the exception of those NZTs in which activities are carried out</i>	Finding accepted.

		<i>under their own legal regime, which will be governed by their implementing legislation.</i> Comment ON THE PROPOSAL TEXT – A paragraph has been added at the end to this effect, including provisions regulating the regime specific to assistance dogs. With this wording, we consider it sufficient to accept the proposal.	
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The wording of the provision contains a significant lack of precision as regards the accreditation and effective guarantee of the training required. In particular, it does not specify who is to provide such training or what mechanisms make it possible to verify that staff have the minimum knowledge required, which may lead to uneven implementation that is difficult for the administration to monitor. Furthermore, the exemption based on practical experience lacks objective accreditation criteria, which introduces a high degree of discretion. On the other hand, the training requirement must take account of the reality of certain types of activity, such as voluntary work, without undermining the guarantees of animal welfare, and must be adapted in proportion to the duties actually performed.	The basic standard sets out the minimum essential criteria, subject to further development and implementation by the Autonomous Communities. The figure of volunteering fits into the experience.
	AIZA	Adaptation of training requirements to zoos and aquariums Article 10 lays down requirements for initial and continuous training for personnel directly handling animals in traditional zoological centres. However, it should be borne in mind that zoos and aquariums: — They have multidisciplinary teams, with professional profiles differentiated according to the species handled and the functions performed. — Not all persons handling animals perform tasks related to animal health or the use of medicines, which are usually carried out by veterinary staff. — Requiring full training in all Annex IV subjects for all staff, as well as regular updating every five years, may be disproportionate and ill-suited to operational reality. Similarly, the article does not expressly recognise the validity of	Partially accepted and redrafted" 4. A degree or degree in veterinary medicine, biology, marine sciences, environmental sciences and the corresponding or equivalent vocational training courses shall be considered to be qualifications authorising, at the request of the persons concerned, the pursuit of the activity described in point 2, without the need for such training, provided that they are adapted to the classification of

		training courses specific to the zoological sector and wildlife, which constitute a standard qualification route for care staff. It is therefore proposed to: — allow training content to be adapted according to the duties actually performed by staff, — to limit certain subjects (such as veterinary treatments) to the corresponding qualified staff, — and expressly recognise the validity of training courses specific to the zoo and wildlife sector, provided that they cover equivalent skills.	the NZT and that it is justified that the curriculum of the studies carried out includes the training, syllabus and duration referred to in this standard or equivalent. However, in those NZTs where activities of education, socialisation and training of assistance dogs are carried out, the professional regime provided for in Royal Decree 409/2025 of 27 May 2015 regulating the activity and welfare of assistance dogs shall apply; and, in the case of zoos and aquariums regulated in Law 31/2003 of 27 October, other specific training or training in wildlife management will also be taken into account.
	Colegio Oficial de Veterinarios de Madrid (Official Veterinary Association of Madrid)	It is proposed to introduce the following amendment: 1. <i>The holder of the NZT shall ensure that all persons engaged in any activity in the NZT, who have contact with the animals, receive adequate and sufficient training for the performance of their activity, to be provided by veterinarians, within a maximum period of 6 months from the starting date of the activity. However, the competent authorities may exempt from this requirement personnel who can demonstrate a minimum of 3 years of practical experience in animal-related work and who ensure a minimum knowledge of the subjects listed in Annex IV.</i>	Not accepted, the standard does not cover the staff who will provide the training, it can be very diverse in view of the different typology of the NZT. In addition, a reserve of activities would be established, which requires legislation with the status of a law.
	ROYAL SPANISH HUNTING FEDERATION	Article 10.1: It is proposed that Article 10 (1) not be applied or, in the alternative, adapted to the specific characteristics of packs of hunting hounds or groups of hounds. The specific training obligation laid down in this provision is based on a zoological model with a professional structure and stable staff, which is not the case for most packs of hunting hounds, where the management and care	Partially, it is accepted that the training is only held by the holder of the NZT. Partially accepted, leaving 8 hours 'unless the sectoral regulations depending on the species require a longer duration.' Idem

		of the animals is usually carried out by the owner himself or in his immediate vicinity, with no formal employment relationship or staff transfer between facilities. It is therefore proposed to exclude from this requirement those traditional zoological centres that do not have contract staff or are managed exclusively by their owners, or to provide for alternative accreditation systems based on experience or training adapted to the specific characteristics of the hunting activity, or on the possession of specific documentation, such as the hunting licence, obtained also by means of training processes that could be adapted to the content. In any case, adapted training should under no circumstances exceed 8 hours, which is more than sufficient due to the nature and activity of these types of centres. — Article 10.2: In line with what has been stated in relation to Article 10 (1), it is proposed that Article 10 (2) be revised with regard to the requirement to adapt and update the knowledge provided for in Annex IV in order to bring it into line with the reality of packs of hounds or groups of dogs intended for hunting. — Article 10.4: It is proposed that the provision expressly include all qualifications and training demonstrating competence in hunting, wildlife management or the natural environment, thus making it possible to recognise technical profiles that are qualified and adapted to the reality of this activity, without imposing unnecessary or disproportionate restrictions.	for updating.
	GENERAL COUNCIL OF THE CHAMBER OF VETERINARY SURGEONS	Article 10 (4) States that NNZZTT staff may be trained by holders of university qualifications in veterinary medicine, biology, marine sciences, environmental sciences and even vocational training courses. However, in the light of the matters set out in Annex IV, which include, inter alia, the following: animal health, hygiene, resistance to antibiotics, food, breeding or ethology, the	This provision does not regulate the training that the trainer must have, but rather the qualifications that they authorise without the need for such training. This has been clarified.

		trainers must first have obtained the knowledge leading to the award of the Diploma or Degree in Veterinary Medicine regulated in Royal Decree 1384/1991 and Order ECI/333/2008, of 13 February, laying down the requirements for the verification of the official university diplomas authorising the exercise of the profession of Veterinary Medicine. For the reasons set out above, it is proposed that Article 10 (4) be worded as follows: <i>'A diploma authorising the holder, at the request of the interested parties, to pursue the activity described in point 2, shall be deemed to be a bachelor's degree in veterinary medicine.'</i>	
	ASELCRE	Accreditation of previous practical experience shall not exempt from regular refresher training or specific training in regulatory, animal welfare, biosafety, hygiene, traceability and responsible use of veterinary medicinal products.	Not acceptable. Previous experience should be equated with initial training (as was the case, for example, in 2013, even with staff working in animal testing centres), without prejudice to the subsequent requirement for updating.
	INTERCIDS	It is proposed to amend the article in order to clearly define the initial and continuous training requirements, establish homogenous adaptation criteria by species and type of NZT, and specify the verification mechanisms , thus ensuring legal certainty, training effectiveness and regulatory consistency.	This is a specific aspect of the legislative development of the Autonomous Communities.
	My friends the pigeons	— 10.4 on training to explicitly include the course of veterinary technical auxiliaries and related courses according to the national institute of qualifications — Exclude volunteers from sanctuaries who will always be accompanied by a trained manager.	The standard covers all VET grades, while TAV is not yet developed, but training courses, not training cycles, are provided for. Equalising experience cannot exclude the way in which it is acquired (volunteering is valid).
	Maxi Lange	We call for a distinction to be made between professional staff and volunteers, for training to be made more flexible and for practical	Experience is already collected, but training should be required

		experience to be recognised.	for all staff.
	Animal Compassion Sanctuary Association Animal Protective Association Saving Bumped Animals	5. (new) Voluntary staff working in sanctuaries or zoological centres for animal protection shall be exempt from the training requirements laid down in the previous paragraphs, provided that those tasks are carried out under the direct supervision of licensed or contracted staff who have the required training.	Not accepted, the minimum training should be required from every person performing tasks in the NZT, otherwise animal health is not guaranteed.
	ARRECAL	Remove the requirement for training for those who already have the status of packs of hunting hounds, or other regulated training on the subject, such as the carnet for handlers of animals specialising in hunting, issued by Autonomous Communities such as Aragon.	Not acceptable. Experience is already covered by the standard, and with regard to additional training, the standard already allows the Autonomous Communities to recognise it.
	ARRECAL	Reduce the minimum duration of training for new packs of hunting hounds from 20 to 6 hours , on the basis of experience in specific regulated training given to more than 4000 hunters by the Aragonese Hunting Federation as a training body approved in accordance with Decree 239/2008 of 16 December of the Government of Aragon laying down the rules for the approval of training courses and those for the accreditation of training bodies, animal caretakers and handlers, training providers for pets and potentially dangerous animals.	Partially accepted.
	ARRECAL	Remove the obligation to undertake regular refresher courses every 5 years. It is not required in the case of a driving licence or a weapons licence. Self-explanatory. We are talking about playful or recreational activities.	Partially accepted, increased to 10 years.
Article 11. Conditions related to animal health.	Susan Bultitude	It is important that hunting dogs are well cared for so that they have their clean, protected space with a sleeping bed and daily food and water.	This is already provided for in the legislation.
	Official Chamber of Veterinary Surgeons of Murcia	Article 11 lays down general health obligations, but it is considered necessary to strengthen their content from the point of view of disease prevention and control. In particular, it is proposed to incorporate the obligation to have	These are aspects specific to the legislative development of the Autonomous Communities, although in principle they appear to be requirements that

		a health plan adapted to the species kept, the veterinary supervision of this health plan, the maintenance of minimum health records relating to diseases, veterinary treatments, mortality and animal movements. With regard to the use of veterinary medicinal products, it is proposed that the wording relating to prudent and responsible use by the operator of the establishment be amended, expressly stating that the use of veterinary medicinal products must be carried out in accordance with the veterinary prescription and in accordance with the legislation in force.	it would not be proportionate to consider for all the NZTs, given their variety. In addition, this is not required for production animal holdings.
	Dimitri Nagib Defranc Cevallos	Adding: Refugees/Sanctuaries or homologable centres will have their emergency plan set up and provided by the local authorities or by the centre itself, given the particular nature of the public interest service it has. This article has been extended to officially recognise the Refugees/Sanctuaries as 'Centinelas' and the first line of warning against fires, infectious outbreaks or episodes of environmental pollution, as part of the Community emergency system and going beyond the facilities themselves.	Not acceptable. This is not a public service, there is no reason for this speciality, and there is no evidence to consider shelters as such entities (first fire warning line, etc.).
	Regional Government of Valencia	It should be made clear that if the censuses are below the censuses in Annex I to RD 346/2025, the animal health visit would not have to be carried out as they are excluded from the scope of RD 346/2025. In the case of dogs, this species is not included in the aforementioned Annex to RD 346/2025. Furthermore, RD 346/2025 differentiates the censuses according to whether they are breeding or fattening, while the draft RD of NZT does not. All these issues should be clarified.	Article 11 (g) has been redrafted in this area and the ninth recital in the preamble has been deleted.
	Balearic island	Article 11: if production animals remain in the NZT, strengthen the ban on destination for human consumption and control Article concerned: Art. 11 and connection to Art. 2.2a. Although Article 2.2 (a) already states that there will be no use for human or animal food, the project does not specify control mechanisms in the case of traditionally producing species. An operational and verifiable obligation should be made explicit. Drafting proposal (add paragraph 4 to Art. 11) 4. Where traditionally food-producing species are kept in the	It is unnecessary to do so as a result of the food safety rules themselves.

		<i>NZT, the operator shall establish and maintain documented procedures ensuring that neither animals nor products or by-products are destined for the food or feed chain and shall make those procedures available to the competent authority.</i>	
	CEVE	Amend point (b) to ensure that all medicinal products have been prescribed “(b) prudent and responsible use of the veterinary medicinal products prescribed, without prejudice to the role and responsibility of veterinarians”	It is unnecessary to do so because of the rules on veterinary medicinal products, essentially Royal Decree 666/2023, and it should also be borne in mind that there are medicinal products that do not require a prescription.
	Catalonia. Directorate-General for Agriculture and Rural Development (Direcció General de Agricultura i Ramaderia)	Article 11 (1) (g) It is not clear whether, in the case of the NZT, it should also be the competent authority in the register of zoological centres that establishes and determines the level of risk of the NZT, as is done in the case of farms, i.e. whether the same criteria as those laid down in section 1.c of Annex II to Royal Decree 346/2025, where it is included, will be applied to the NZT.	Article 11 (g) has been redrafted in this area and the ninth recital in the preamble has been deleted.
	Catalonia. Department of Territori, Habitatge i Ecological Transitions	Article 11.3. We do not understand the wording (it is intended for production animals that have lost their purpose, but this would not be the case for dogs, falconry birds, etc.). It should simply be stated that it must be carried out by a professional veterinarian. Differentiate euthanasia of slaughter.	New wording has been added. '3. The provisions laid down in the legislation in force on animal health and protection requirements for the killing of animals carried out outside slaughterhouses, or the appropriate protocols in application of the <i>lex artis veterinaria</i> , depending on the species concerned, shall <i>apply mutatis mutandis</i> to the euthanasia of animals from traditional zoological centres.'

	AGRIFOOD COOPERATIVES	ALTERNATIVE WORDING <i>(b) prudent and responsible use of veterinary medicinal products, without prejudice to the role and responsibility of veterinarians, and in compliance with the provisions of the legislation, in particular Royal Decree 666/2023 of 18 July regulating the distribution, prescription, dispensing and use of veterinary medicinal products and Royal Decree 1002/2012 of 29 June laying down implementing measures for Community legislation on the marketing and use of feed and amending Royal Decree 1409/2009 of 4 September regulating the preparation, placing on the market, use and control of medicated feed.</i> EXPLANATIONS It is essential for this legislation to make it clear that these zoological centres are subject to the legislation on veterinary medicinal products, bearing in mind that they are not animals for the production of food or other by-products.	It is unnecessary.
	Colegio Oficial de Veterinarios de Madrid (Official Veterinary Association of Madrid)	It is proposed to introduce the following amendment: 1. Each person holding a NZT must ensure that: <i>(a) the health of kept animals under their responsibility; complying with all the indications laid down by the designated veterinarian of the NZT as regards animal welfare and health, biosafety, hygiene and veterinary medicinal products.</i> <i>(b) prudent and responsible use of veterinary medicinal products always under the instructions and prescriptions of the designated veterinarian of the NZT, without prejudice to the role and responsibility of veterinarians;</i> <i>(c) minimise the risk of disease spread;</i> <i>(d) proper handling of the animals;</i> <i>(e) take appropriate biosecurity measures with regard to animals and products under their responsibility;</i> <i>(f) comply with health programmes, including vaccinations, diagnostic tests or other disease surveillance and control measures established by the competent authorities of the Autonomous</i>	Not acceptable. The legislation does not lay down an obligation to have a veterinarian, and unless the veterinarian draws up a health and welfare plan, only the need to have veterinary services is considered, but it may be not a priori (as seems to be understood from the observation), but a posteriori.

		<i>Communities and Cities.</i> <i>(g) that NNZZTs under their responsibility receive the animal health visit carried out by a veterinary person in private practice, in accordance with Royal Decree 346/2025 of 22 April laying down the bases for implementing European Union animal health legislation, as regards the surveillance obligations of the owner of the holding, and amending various rules on livestock farming, depending on the frequency provided for in paragraph 2 of Annex II to that legislation.</i> <i>2. The provisions of this Article shall be without prejudice to the animal health obligations incumbent on the owner of the animal, when it is not the same person as the NZT, and to the obligation for the veterinarian designated in the NZT to attend the NZT at the frequency necessary for the review and application of treatments and medicines to the animals, for the control of existing medicinal products in the centre and for the management of any question relating to its tasks, established at least once a month.</i>	
	ROYAL SPANISH HUNTING FEDERATION	Article 11 (1) (g): It is proposed that this type of nucleus, dedicated to dogs or auxiliary game animals, be exempted from the annual veterinary visit, where appropriate on the basis of the zootechnical and health regulations and the corresponding regional regulations.	There are no health reasons for such a derogation, especially since the anti-rabies vaccination, for example, in many Autonomous Communities is annual.
	GENERAL COUNCIL OF VETERINARY COLLEGES	It is proposed to include the obligation to have a health plan adapted to the species kept, the veterinary supervision of this health plan, the maintenance of minimum health records relating to diseases, veterinary treatments, mortality and animal movements. With regard to the use of veterinary medicinal products, it is proposed to amend the wording relating to ‘prudent and responsible use’ by the operator of the establishment, expressly stating that the use of veterinary medicinal products must be carried out only in accordance with the veterinary prescription and in accordance with the legislation in force.	It is not accepted. The obligation to have a health plan is not proportionate for all NZTs. This is an aspect that will be assessed according to the type of centres, in the legislative development. In addition, the use of medicinal products will depend on the type of medicinal product, but the rule should set the obligation of rational and prudent use in all cases.

	ASELCRE	The comprehensive health plan must be coordinated with the register, the animal welfare plan and, where appropriate, with the actions of the veterinary person of the NZT, so as to allow integrated supervision of health, biosafety and handling conditions.	It has already been explained that there is no obligation for a health plan as such.
	INTERCIDS	Amend the article to establish clear, measurable and differentiated criteria according to species and type of establishment, specifying the mandatory minimum conditions for installations and separating what is strictly required from the technical recommendations. This amendment would ensure consistency with the general purpose of the Royal Decree and legal certainty for operators and authorities.	These are aspects of the regulatory development of the Autonomous Communities.
	ANPROGAPOR	Article 11. 1 (f) It is important to add to some of the measures established by the Autonomous Communities and Cities that they must also comply with the national legislation on disease control and the official vaccination programmes. In the case of pigs, the NTZs must be categorised in relation to Aujeszky's disease in such a way that they cannot under any circumstances be A4 and are therefore compulsorily subject to a vaccination programme.	The plans of the Autonomous Communities will always be the national ones, and then the own ones.
	Maxi Lange	It is requested that health programmes and veterinary visits be adapted to the real risk, avoiding disproportionate burdens and taking into account the reality of rescued animals.	It is already reflected in the standard.
	Andalusian Council of Official Chambers of Veterinary Surgeons	It is proposed that Article 11 (Hygienic and health conditions) include an express reference to the obligation to guarantee the preventive and compulsory veterinary treatments appropriate to each species. Article 11 should cover the health plan for the zoological nucleus drawn up by the veterinary staff of the NZT.	There is no compulsory health plan, and Article 11.1 (f) already provides for compliance with these compulsory plans and treatments established by the Autonomous Communities.
	Andalusian Council of Official	It is considered necessary for Article 11 to include the obligation for each animal to have at least a health card, an up-	This is already provided for in Article 12.

	Chambers of Veterinary Surgeons	to-date veterinary health record and a record of its identification – where legally required.	
	Andalusian Council of Official Chambers of Veterinary Surgeons	It is proposed to incorporate into Article 11 the obligation for animals to be subject to regular health checks by the veterinarian responsible for the NZ, at minimum intervals to ensure the appropriate health status of the animals.	It is an aspect of regulatory development and implementation, depending on the species, diseases, etc.
	Animal Compassion Sanctuary Association Animal Protective Association Saving Bumped Animals	Proposal for amendment of Article 11 <i>Article 11. Conditions related to animal health.</i> <i>“(f) comply with health programmes, including vaccinations, diagnostic tests or other disease surveillance and control measures established by the competent authorities of the Autonomous Communities and Cities. However, in the case of animal protection sanctuaries or zoological centres, the competent authority shall exempt the application of the measures on depopulation or compulsory slaughter, provided that it is ensured that they are excluded from the food chain and from commercial livestock channels. In such cases, these measures may be replaced by the application of reinforced protocols for physical isolation, biosecurity and health surveillance under official veterinary control.”</i>	Not acceptable. The legislation already provides for specific conditions for shelters as regards the slaughter of animals, the freedom of action of the Official Veterinary Services cannot be undermined by preventing empty animals or slaughtering if this is appropriate on the basis of a risk analysis or required by the legislation, and there are no health reasons that justify different treatment of the disease and species depending on the type of NZT.
	Animal Compassion Sanctuary Association Animal Protective Association Saving Bumped Animals	2. Equidae and any animal of production species (bovine, ovine, caprine, porcine and avian) housed in NNZZT and, in particular, those classified as sanctuaries or zoological centres for animal protection, must be listed as ‘unfit’ for human consumption in the animal passport and in the database provided for in Article 4 of Royal Decree 728/2007 of 13 June 2007.	It is not accepted for animals other than equidae.
	ARRECAL	Article 11 (1) (g) is difficult to understand, since it refers again to	We do not accept this reference, which makes the provision clearer by equating

		another provision without clarifying the core of the prohibition. Although Article 11 (3) seems clearer, it is recommended that the wording of both provisions be simplified, using more direct and accessible language, given that the rule is also aimed at persons without legal or veterinary training.	the NZT with other animal holdings.
	ARRECAL	On the other hand, that NNZZTs under their responsibility receive the animal health visit carried out by a veterinarian in private practice, depending on the frequency provided for in point 2 of Annex II to that standard; once again, a strict livestock rule is applied to packs of hunting hounds, contrary to their unique nature; we insist that they are not production animals or pets.	No livestock rule applies, but a frequency of visits already established for other animal holdings (in the concept of Law 8/2023), which now applies in a similar way to the NZT. And packs of hunting hounds can be holdings of productive animals, understood (as defined by Law 8/2003) as those from which a lucrative consideration is obtained, as the Supreme Court made clear in its judgment 368/2008 of 2 February 2008, Fundamento de Derecho tercero.A, rec. 7/2006 (ECLI:ES:TS:2008:368); this is also reflected on the website of the complainant association (http://arrecal.com/normativa/arrecal/guiarehalas.pdf).
Article 12. Identification of livestock	AnimaNaturalis International Foundation	Article 12 (4) provides that hunting dogs must be linked to the hunting licence of their holder. This system is insufficient to ensure the actual traceability of the animals, given that: — does not establish mechanisms to monitor the number of animals associated with a licence	Not acceptable. They are individually identified animals, which links them to their owner, and it is mandatory to notify their deregistration, in accordance with the future

		— does not create a specific register of dogs used in hunting — it does not provide for any obligations to report deaths, deaths or disposals. As a result, the proposed system does not allow for effective monitoring of animals, making it difficult to prevent abandonment and irregular trade.	Royal Decree (current draft) on the identification of pet animals, as well as with the legislation in force in the Autonomous Communities.
	Dimitri Nagib Defranc Cevallos	Refugios/Santuarios or homologable centres shall have their own registration system that is different from the other centres and regulated by the Autonomous Community or cities of Ceuta and Melilla in which they are located. Under no circumstances should this legislation be more administratively demanding than other centres such as zoological centres or operating centres. In any case, the authorities should facilitate the work of these centres as they are centres of interest for society and the environment.	It is not appropriate to make exceptions for shelters.
	ELEVEN FOUNDATION OF THE GUIDE DOG	The application of the general regime for pet dog handlers to assistance dog handlers is not justified because assistance dogs have their own special regime, regulated by regional rules. We understand that the qualification regime for the responsible persons and professionals of the entities involved in the training of assistance dogs should be preserved, and that it should continue to be governed by the regulations approved by the competent administration and be in line with the provisions of the international standards of IGDF and ADI. Therefore, in the regulation of the approval or acquisition of the qualifications required to carry out the activities inherent in the education of pet animals, training of assistance dogs should be excluded, which will be governed by the specific legislation applicable to it approved by the competent administration. If the wording proposed in the Royal Decree were followed, it would deviate from that specific regime. It is therefore proposed that it be worded as follows: <i>4. All dogs and ferrets, including those referred to in this Royal Decree, shall be registered in the Autonomous Community registers on the identification of pet animals and, in the case of shepherd or defence dogs, the keeping and handling of livestock, shall be linked to the livestock holding registered in the General Register of Livestock</i>	Already included.

		<i>Holdings where they carry out their activity; in the case of game dogs and ferrets, be linked to the corresponding hunting licence of their holder or owner; in the case of dogs involved in sporting activities, they shall be linked to the federation licence of their holder or owner; in the case of surveillance and security or rescue dogs, be linked to the public administration, force or security corps or authorised private company where they carry out their professional activity; and in the case of guide, assistance or assisted intervention dogs, they shall be linked to the health professional or specialised and accredited body, or recognised by the competent administration, holding them.</i> Comment ON THE PROPOSAL TEXT – guide dogs are included alongside the other assistance dogs and would be registered with the entities specialised in their training, which are the owners of the dogs.	
	Regional Government of Valencia	With regard to the sentence ‘the competent authority may establish the criteria for identifying animals of unknown origin entering NNZZT referred to in Article 3 (d)’, it should be noted that in the case of unidentified animals of unknown origin, these animals may not be included in the RIIA. It does not seem very appropriate for each Autonomous Community to decide on its own how to identify this type of animal. Delete paragraph 5.	Not accepted, it is up to each Autonomous Community to decide. Not accepted, the census declaration allows the competent authority to know how many animals are present in each NZT.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	o With regard to the first paragraph, the current wording introduces a relevant indeterminacy by stating that the competent authority ‘may’ set the criteria for identifying animals of unknown origin, which creates legal uncertainty and may lead to uneven application across territories. This issue is particularly relevant in the case of animals of production species that lack traceability, as the absence of	There is already a reference to the applicable legislation in each case. The Autonomous Community criterion for animals of unknown origin only applies to shelters, which collect animals in very few unidentified cases and therefore no longer

		clear criteria may make it difficult to identify, regularise and integrate them into zoological centres, with the consequent impact on animal health, administrative control and the prevention of irregular movements. Furthermore, the lack of precision regarding the identification systems applicable to each species limits the effectiveness of the provision and makes it difficult to apply it in practice, and it is therefore necessary to establish expressly and uniformly the identification mechanisms allowed. o With regard to paragraph 4, the same reasons are given for the argument in the first paragraph. These issues are already included in the draft Royal Decree on the identification of pet animals, which is being processed by the Ministry of Social Rights, Consumer Affairs and Agenda 2030. Proposed amendment 1 [...] notwithstanding the above, the competent authority shall establish the requirements and criteria for the identification of animals of unknown origin entering NNZZT referred to in Article 3 (d), ensuring their correct traceability and registration in accordance with the applicable legislation. The identification systems permitted for each species must also be expressly specified, in accordance with the legislation in force, including the alternatives referred to in the eighth final provision. Deletion of point 4.	leave those centres.
	AIZA	Adaptation of identification systems to zoos and aquariums Article 12 lays down the requirements for the identification of animals in accordance with the legislation in force for each species. In the case of zoos and aquariums, although these establishments already apply advanced identification and traceability systems, the	Partially accepted, and included for species that do not have specific regulations, with a new paragraph: 'Similarly, in the zoos and aquaria referred to in

		reference to species-specific legislation may give rise to uncertainty in relation to species not expressly covered by that legislation. In addition, these establishments regularly use management and identification systems that are widely recognised at international level, ensuring high levels of traceability and health control. In this regard, it should be noted that for certain species (especially in the field of aquariums) individual identification is not technically and materially feasible. This is the case, inter alia, for small fish, species kept in groups, or aquatic invertebrates, where traceability is usually managed at group, batch or facility unit level (tank, system, etc.). It is therefore proposed to: expressly recognise the validity of identification systems used in zoos and aquariums, allow the adaptation of identification methods according to species and technical practices in the sector, and expressly provide for the possibility of using group or batch identification systems where individual identification is not feasible.	Law 31/2003 of 27 October 2007, the internationally accepted group or batch identification systems used therein shall be valid for those species which do not have mandatory individual identification under national or European Union legislation.'
	Catalonia. General Direction of Agriculture i Ramaderia	We do not agree with what corresponds to the linking of livestock guarding and handling dogs or defence dogs on a livestock holding. This requirement does nothing more than complicate both administrative management and management by holders. In the end, we will have a database which will never be updated and which does not provide any information or guarantee of animal protection or animal health. In any case, we do not understand how a shepherd dog will be administratively linked to a livestock farm.	Not acceptable. The nature of an on-call dog and livestock management is closely linked to the performance of its tasks on a livestock holding. Linking shall be carried out simply by including the individual identification of the dog in the list of animals included for that holding in the REGA.
	Castile and Leon	Point 5, with regard to the 'declaration of non-exempted censuses', 'those NZTs that keep dogs and ferrets', if there is an obligation in the register of pet animals to keep the NZR number in which they are located up to date in the location/address details of the animal? [...] could be exempted from reporting censuses. Will the draft register of pet animals referred to in the general conditions, when communicating censuses, oblige 'centres for permanent dog accommodation' to declare censuses to two registers?	It has already been explained that it will prevent the NZT from being duplicated with that provided for in the Royal Decree on the zoological centres of pets.

	Maria Angeles Diaz Rodelgo	Article 12 on identification and control proposes a system based on linking animals to the holder's hunting licence. This system is insufficient in that it does not provide for: — individual registration required — reporting of absences, deaths or disposals — control of the number of animals In practice, this favours situations of abandonment and irregular trade. REQUESTS: The creation of a specific, mandatory and traceable register of all animals used in hunting activities.	Not acceptable. The link is to prove that it is a game animal, the identification (and the obligations inherent in it, such as registration, deregistration, etc.) is regulated by the Royal Decree on the identification of pet animals.
	ROYAL SPANISH HUNTING FEDERATION	— Article 12.4 It is proposed to amend Article 12 (4) in order to expressly provide for the possibility of linking dogs intended for hunting activities to a federation licence specific to the animal, where such a licence exists in accordance with the rules of hunting sports federations. — Article 12.5 The provision provides that holdings keeping individually identified animals in accordance with Royal Decree 787/2023 of 17 October 2007 are exempted from the declaration of censuses, although traditional zoological centres housing dogs and ferrets are expressly excluded from this exemption. In this respect, it is considered that such exclusion is unjustified and contrary to the logic of the individual identification system itself, insofar as dogs, ferrets and other auxiliary game animals that are duly identified in accordance with the legislation in force already have a fully functioning individual traceability system in place. It is therefore proposed that Article 12 (5) be amended so that dogs, ferrets and other auxiliary game animals duly identified individually in accordance with the legislation in force are also exempted from the obligation to declare censuses, in line with the general system provided for in that provision. In the alternative, in the event that this proposal is not accepted, and in particular in	This is not accepted; it is an aspect to be considered in any case in the legislative development of the Autonomous Communities, in cases where this is provided for. We do not accept this exclusion. The rule only covers animals of livestock species. In the case of dogs, cats and ferrets, annual censuses must be declared in order to be aware of them.

		relation to ferrets, it is considered that a simplified census declaration system, based on an overall count of specimens, without the requirement of mandatory individual identification, should be envisaged in order to ensure proportionate administrative management adapted to the reality of these holdings.	
	ASELCRE	The veterinary staff of the NZT shall carry out advisory, monitoring and control duties in relation to animal welfare, animal health, biosafety, hygiene, veterinary medicinal products and the management of health incidents, as required by the applicable legislation and by the comprehensive health plan.	It is unnecessary, and the rule only requires veterinary services, as these are not livestock farms. Their functions shall be as appropriate in each case.
	INTERCIDS	Pet animals fall outside the scope of this rule and there is therefore no need to include provisions affecting them, as provided for in Article 12(4). Furthermore, despite the rules on documentation and registration of the NZT, there are no issues regarding the minimum content, format, periodicity and retention of records. In addition, generic references are introduced to control procedures that do not correspond to verifiable objective criteria. This lack of precision hampers the homogeneity of implementation and creates legal uncertainty about the obligations of operators. In the light of the above, we propose to amend Article 12 in order to: - Delete paragraph 4. - Specify objectively the content, format and periodicity of the records, as well as the associated control procedures, clearly differentiating the legal obligations from the technical recommendations. This ensures that the rules are applied uniformly, increasing legal certainty and the effectiveness of NZT controls.	Cats and ferrets covered by this rule are excluded from the scope of Law 7/2023. The other issues are specific to the legislative development of the Autonomous Communities.
	FAPAM	Reason for the claim.	It is not accepted for the

	ANIMAL JUSTICE	The same as for the argument in the first point. These issues are already included in the draft Royal Decree on the identification of pet animals, which is being processed by the Ministry of Social Rights, Consumer Affairs and Agenda 2030. Proposed amendment Deletion of point 4.	reasons set out above.
	Maxi Lange	Identification is considered appropriate, but it is requested that it be adapted to rescue situations, administrative simplification and flexibility in cases of urgency.	The claim is not understood, identification is mandatory.
	GENERAL COUNCIL OF ANDALUSIAN VETERINARY ASSOCIATIONS	It makes no sense for the declaration of an equine animal as unfit for human consumption to depend on the type of establishment in which it is kept, since that fact has no direct connection with its true fitness for consumption. We therefore request that Article 12 (2) be deleted or, as the case may be, amended in order to bring it fully into line with the European Union's regulatory framework.	Since holdings of animals intended for purposes other than human consumption are regulated, these equidae must be so declared, otherwise they will be governed by Royal Decree 804/2011 and the other rules applicable to that purpose.
	GENERAL COUNCIL OF ANDALUSIAN VETERINARY ASSOCIATIONS	With regard to Article 12 (4) concerning the linking of certain animals to specific licences or administrative registers depending on their activity or purpose, we consider that, in order for this to be effective, it must be determined when it becomes effective , as well as the requirement for documentation that actually proves the activity or purpose at the time of registration, and under which objective criteria it must be carried out .	It is a permanent link for the purposes of this Royal Decree.
	GENERAL COUNCIL OF ANDALUSIAN VETERINARY ASSOCIATIONS	The wording of Article 12 (5) is ambiguous and creates legal uncertainty by providing for an exemption from the declaration of censuses for individually identified animals, excluding dogs and ferrets without justification.	They are excluded for the above reasons for dogs, cats and ferrets.
Article 13. Movement of animals	ADDA ASSOCIATION FOR THE DEFENCE OF	Section b. By way of exception, in the case of NNZZT classified, in accordance with Article 3 (1), as temporary shelters, movements to the holdings defined in Annex III to Royal Decree 479/2004 of 26 March 2004 shall be permitted, as shall movements to NNZZT	The provision is not intended to prohibit activities which are now lawful, for which purpose a statutory provision would also

	ANIMAL RIGHTS	samples, races, exhibitions and competitions classified as private bird collections and to those NNZZT that host falconry birds, hunting decoys and pigeons in accordance with Article 3 (1). It should be noted that private bird collections and competitions for hunting, hunting or races are activities which should be prohibited as they serve only entertainment and inflict suffering on individual animals.	be necessary.
	THE COMMUNITY OF MADRID	Drafting proposal: <i>'Animals may be moved between NNZZT of the same classification, although animals may not be moved from NNZZT to other holdings defined in Annex III to Royal Decree 479/2004 of 26 March 2004, either directly or indirectly, except in cases of force majeure and always prioritising movement to another NZT for animal welfare reasons duly justified and authorised by the competent authority, ensuring, in any case, that such animals are not intended for human consumption.'</i>	Partially accepted, rewording.
	Regional Government of Valencia	It would be useful to specify more precisely in which animals they need and in which cases they need a movement health certificate. It should be made clear that this type of establishment has highly mobile animals and therefore there are no health certificates for the movement of pigeons or dogs between traditional zoological centres or for the movement from the packs of hunting hounds to the place where the competition is held, hunting hounds, etc. All of this involves a high bureaucratic burden and it must be clarified whether they are in all cases movements subject to traceability by the REMO application.	The cases are those provided for in the legislation, the Royal Decree does not innovate. Of course, REMO will only apply to the species and movements included in it.
	IMIDRA	Article 13 lays down strict prohibitions on movements from Traditional Zoological Numbers to livestock holdings, allowing only very limited exceptions, which could cause practical problems if a farmer unintentionally delivers an animal from a Traditional Zoological Number or if it is necessary to move an animal to a CENSYRA for diagnosis, reproductive assessment or sanitary management. It is appropriate to request the inclusion of an explicit	It is unnecessary, CENSYRAS do not usually feed on NZT animals.

		derogation allowing movements to official centres for selection, reproduction, genetic improvement or diagnosis belonging to public administrations, provided that the applicable health protocols are complied with.	
	Balearic island	Article 13.1.a): a real ban on movements to REGA; force majeure outside the general umbrella Article concerned: Article 13.1a. The 'force majeure and animal welfare' exception opens a wide door and can standardise what should be exceptional. If there is force majeure, it should be resolved by specific authorisation, but not as a predetermined general exception. Drafting proposal (amendment to Art. 13.1a) (a) <i>Animals may be moved between NNZZT of the same classification. Movements of animals from the NNZZT to other holdings defined in Annex III to Royal Decree 479/2004, either directly or indirectly, shall not be permitted.</i> <i>Exceptional cases of force majeure or animal welfare shall be dealt with, where appropriate, by express authorisation from the competent authority, outside the ordinary movements provided for in this Royal Decree.</i>	Partially accepted, new wording specifying the criterion of the competent authority.
	Balearic island	Article 13.1.b): delete it and relocate temporary shelters to REGA If claim 2 (temporary shelters outside the NZT) is accepted, this paragraph becomes meaningless. Drafting proposal (Delete) Article 13 (1) (b).	Not accepted, it is a natural movement back to a livestock holding.
	Balearic island	Article 13.1.c): clarify if livestock fairs/competitions include birds and under which documentation The regime applicable to movements to fairs/competitions, especially birds, should be clarified to avoid different interpretations. Drafting proposal (addition of clarification to Article 13.1 (c)) (c) <i>Movements to livestock fairs or competitions shall be carried out in accordance with the system of movement and health documentation applicable according to the registration classification of the establishment and the species.</i>	It is unnecessary, movement is allowed, but obviously when the rules applicable in each case are complied with.

	FOUNDATION FOR ANIMAL ADVICE AND ACTION	It is considered necessary to make express provision for the case of production animals that have been abandoned and are not traceable, given that in practice these cases pose significant management difficulties from a health and administrative point of view. The absence of specific rules may prevent their proper collection and transfer to authorised facilities, or encourage their handling outside controlled circuits, increasing the risks to animal health, biosecurity and public health. It is therefore appropriate to authorise, on an exceptional basis, their transfer to zoological centres classified as shelters, subject to prior health tests and their stay in quarantine facilities, thereby ensuring effective control of their health status and preventing the possible introduction or spread of diseases. Proposed amendment: <i>Insertion of a new paragraph (d): By way of exception, animals considered to be productive that are in a state of abandonment in public or private places and that lack traceability because they are not correctly identified may be moved to a NNZZT classified as a shelter in accordance with Article 3.1, provided that the required tests have been carried out, that they guarantee their health status and, once there, that they are located in the NZ quarantine facilities for as long as the veterinary services indicate."</i>	The rule already allows such movement, and even its exceptional identification.
	AIZA	Ensuring animal movements in zoos and aquariums under conservation programmes Article 13 lays down restrictions on the movement of animals between traditional zoological centres and other types of holdings, setting up a system that restricts such movements save in exceptional cases. However, in the case of zoos and aquariums, movements of animals are an essential and inherent element of their activity, in particular in the context of: — conservation programmes for endangered species, — transfers between zoo centres, rescue centres and other	Not accepted, the rule does not prohibit such movements, it will depend on EU rules in these cases, which will also apply, for example, to movements between quarantine centres, etc.

		specialised establishments. In this context, the restrictive application of Article 13 could: making these movements more difficult or impossible, creating legal uncertainty and compromising the participation of Spanish centres in international conservation programmes. Similarly, the article does not expressly clarify the classification of equivalent centres located outside Spain or their classification as NNZZT, which is particularly relevant for international movements. It is therefore proposed to: expressly recognise the uniqueness of movements associated with zoos and aquariums, ensuring that these can be carried out in the framework of conservation and international cooperation programmes; — and to clarify that movements may be carried out with equivalent centres, including those approved in other Member States of the European Union.	
	Castile and Leon	In point 2 “including exceptions for sporting, cultural and silvestrism activities” is it necessary to do so? — School farms that keep equidae cannot carry out a commercial transaction with leisure farms covered by Royal Decree 804/201, such as equestrian farms and non-commercial farms? (if they are placed on the market, they would have an agricultural purpose and should be as a Production-Reproduction? even if it is when they are going to close down due to definitive cessation of activity?).	It is included for reasons of legal certainty. However, in the case of school farms it does not seem appropriate, and if it is by closure, they will be moved to another equivalent NZT or to a shelter.
	ROYAL SPANISH HUNTING FEDERATION	Article 13.2 With regard to Article 13 (2) on the movement of animals, it is proposed that it be deleted. We consider that Article 13 (2) should be deleted in its entirety, as it is redundant, unnecessary and potentially disruptive to the current legal regime, thus avoiding restrictive interpretations that are not supported by the current regulatory framework.	It is not accepted, it means reflecting what is already in force.
	INTERCIDS	For the reasons set out above, pet animals fall outside the scope of this provision and there is therefore no need to include provisions affecting them, as provided for in Article 13 (1) (c). On the other hand, the regulation of the movement of animals	It is not accepted for the reasons already set out that duplication of legislation will be avoided, and that sufficient regulatory leeway should be left

		combines general rules with very broad and limited exceptions, such as movements for “welfare reasons” or for sport, cultural or silvestrismo activities. This wording introduces a high degree of discretion, leaving the scope of authorisations undefined and creating legal uncertainty for NZT holders, as well as risks of non-compliance with health and traceability regulations. On the basis of the above, it is proposed to: Delete paragraph 1 (c) Clarify and define the cases in which movements are permitted, defining objective and verifiable criteria that ensure traceability, health protection and animal welfare, clearly differentiating between routine, exceptional and strictly controlled movements, in order to ensure regulatory consistency and legal certainty.	to the competent authorities, both for the development and for the application of the legislation.
	My friends the pigeons	Eliminate silvestrismo, an illegal practice banned at European level. 13.1. b remove derogations for pigeons, hunting decoys and bruising	A prohibition requires a rule having the force of law.
	Maxi Lange	The scheme is considered to be overly restrictive. It is requested that it be made more flexible to allow for rescues, including animals with no traceability through quarantine, veterinary observation and progressive regularisation protocols. The multi-species reality of sanctuaries, which hinders the uniform application of restrictions, should also be taken into account.	This is not accepted, as there are no health reasons for relaxing the movement regime.
	ARRECAL	In paragraphs 13.1 (a), 13.1 (b) and 13.2, references to other legislation (including a Royal Decree) are included in the provision itself, which makes it significantly difficult to understand. It is recommended that the wording be improved in order to clarify the content of the regulation.	The standard is easy to understand.
Article 14. Registration	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	It should be noted that the approval of the application for ‘administrative silence’ will be valid for 1 year after the entry into force of this Royal Decree.	The duration of a responsible authorisation or declaration is in principle unlimited, in accordance with Article 7 (1) of Law 17/2009, without there

			being any general interest in this case to limit it, all without prejudice to the possibilities for action provided for in Article 7.2 of that Law and in Law 39/2015.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The provision that the application is deemed to have been granted by administrative silence introduces a serious risk in the area of zoological centres, by making it possible to obtain authorisations without prior verification of compliance with the requirements. Given the nature of the activity, which has a direct impact on animal health, public health, biosecurity and animal welfare, the authorisation must necessarily be explicit. The application of positive silence in this context may lead to the legalisation of situations that are contrary to the legislation, rendering meaningless the preventive checks specific to the authorisation regime. Proposed amendment: <i>Article 14. Registration</i> <i>The competent authorities of the Autonomous Communities and Autonomous Cities that are responsible for this matter shall enter in the NNZZT register, on their own initiative or at the request of the interested party, those located within their territory.</i> <i>The procedure shall be initiated at the request of the party concerned or on its own initiative. In accordance with Article 21 of Law 39/2015 of 1 October 2015 on the Common Administrative Procedure of Public Administrations, the maximum time limit for issuing and notifying the corresponding decision shall be six months from the date on which the application is entered in the electronic register of the administration or body competent for authorisation, or, if the procedure is initiated ex officio, from the date on which it is initiated.</i>	The rejection of administrative silence requires legislation with the status of a law or EU or international law, which provides for this, which is not the case, nor are we dealing with the other specific cases provided for in Article 2 (3) and (24.1) of Law 39/2015.

		<i>If no express decision has been issued and notified within the maximum period, the application shall be deemed to have been rejected by administrative silence.</i> <i>Under no circumstances may the application for the authorisation of zoological centres be deemed to be granted by administrative silence on grounds of general interest relating to animal health, public health, biosecurity and animal welfare.</i>	
	AIZA	Registration The provisions relating to the registration of traditional zoological centres provide for the entry of establishments in the relevant registers. In the case of zoos and aquariums, it should be borne in mind that these establishments already have mechanisms for identification, control and administrative supervision at Autonomous Community level pursuant to Law 31/2003 of 27 October 2007, which lays down specific procedures for evaluation, inspection and authorisation by the competent authorities. In this context, the additional application of the registration regime provided for in this Royal Decree, without appropriate coordination mechanisms, may lead to administrative duplication, unnecessarily increasing burdens and creating potential overlaps between systems. For all these reasons, it is considered appropriate to avoid creating duplicate registration obligations and to provide for mechanisms that make it possible to take advantage of the information already available in the existing Autonomous Community registers, by means of arrangements for coordination and exchange of information between administrations that facilitate the registration of these establishments in an agile and efficient manner, while clarifying the relationship between the various applicable administrative regimes, ensuring their proper coordination, strengthening the coherence of the system and ensuring proportionate compliance with animal health obligations.	It is not accepted, these are different records, in this case for reasons of animal health and welfare.

	Catalonia. Department of Territori, Habitatge I Ecological Transitions	Is the NNZZT register included in the REGA? It is not explicitly stated anywhere in the document. Silence should be rejection and some procedures should be carried out by a self-declaration. Furthermore, the meaning of silence in Law 31/2003 is negative and therefore contradicted.	It is covered by the first DF of the project. As regards the rejection of silence, this is not possible for the reasons set out above (it is precisely that of Law 31/2003 which is laid down in legislation with such a status).
	INTERCIDS	It is proposed to specify the deadlines and procedures for registration, amendment and cancellation, including objective criteria for assessing initial and subsequent compliance with the requirements , so as to remove doubts about administrative application, ensure legal certainty and strengthen the consistency of the register with the general objective of the Royal Decree.	This corresponds to the regulatory development of the Autonomous Communities.
	Maxi Lange	It is requested to speed up procedures, allow for provisional operation and ensure cure before cancellation, applying the principle of proportionality.	The envisaged procedure is already agile.
Article 15. Authorisation or registration by self- declaration	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	Point 2: Indicate that the registration after the submission of the corresponding self-declaration will be valid for 1 year. After this period, the validity of the authorisation must be confirmed by official control.	It is not accepted, for the reasons already set out with regard to the same argument put forward by ANDA.
	THE COMMUNITY OF MADRID	Drafting proposal: <i>1. In order for NNZZTs to be entered in the register referred to in Article 14, either for the first time or as a result of a change in their classification, they must have been authorised in advance by the competent authority, in accordance with the provisions of Article 36 of Law 8/2003 of 24 April, to which end they must demonstrate compliance with the requirements laid down in this Royal Decree. Once authorised, they must provide prior proof of the municipal authorisation or licence; or</i> submit a declaration of compliance with all the provisions of this Royal Decree and the applicable local legislation to the competent authority. The NZT shall be entered in the register provided for in Article 14 and the corresponding number shall be	The authorisation referred to in this project is health authorisation, in accordance with Law 8/2003, and without prejudice to any licensing requirements under local legislation.

		<i>assigned. Such registration shall be essential for the start of the activity.</i> <i>2. By way of derogation from the previous paragraph, the competent authorities may exempt certain NNZZTs from prior approval, on the basis of an assessment of their health risk, unless they are confined or quarantine establishments. In this case, they shall be entered in the Register after the submission of the corresponding declaration of responsibility in accordance with Article 69 (3) of Law 39/2015 of 1 October, which shall be addressed to the competent body in whose territorial area the seat of the NZT is located.</i> <i>This declaration shall be drawn up in the official language of the Spanish State, without prejudice to the use of other official languages according to the Autonomous Community.</i>	
	Dimitri Nagib Defranc Cevallos	'Refugios/Santuarios' or 'Centros homologables' shall not be penalised under laws specific to livestock farming or operating centres. Due to its uniqueness, a general framework should be established at national level and with the specific competences of each Autonomous Community. These rules must be aimed at protecting the environment, humans and the species that inhabit them.	The exemption from a system of penalties provided for in a law requires a rule having the status of a law.
	Official Chamber of Veterinary Surgeons of Murcia	It is considered necessary to specify the documentation to be provided in order to apply for the authorisation of a traditional zoological nucleus. It is proposed to make it compulsory to submit, at least, a description of the activity, plans of the facilities and a technical veterinary report of the zoo. It is also proposed to include an annex in the Royal Decree laying down the minimum content of the veterinary technical report.	This corresponds to the regulatory development of the Autonomous Communities.
	Balearic island	Article 15.2: specify which amendments it is necessary to communicate; add "inactivity" and de-registrations as in REGA Legal and technical grounds: The expression 'any modification' is indeterminate and may lead to excessive burdens and disparity of criteria. In addition, there is a lack	Not accepted, any amendment should be communicated as it will refer to any requirement considered essential for the initial declaration.

		of a clear figure for 'inactivity' and a procedure for withdrawal due to inactivity, which is in line with the REGA logic. Drafting proposal (amendment of the paragraph of Article 15.2 and addition of two paragraphs): <i>In case of any change to the particulars contained in the declaration, the applicant shall submit an amendment application.</i> <i>For these purposes, at least the following shall be considered substantial modifications: change of ownership, change of location, change of classification, relevant changes in species maintained, significant change in capacity/census and modifications affecting biosafety or operating conditions.</i> <i>The declaration of inactivity of the NZT, as well as the procedure and effects of removal from the register, shall also be authorised in accordance with criteria similar to those laid down in Royal Decree 479/2004, without prejudice to the special features of this register.</i>	
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The provision allowing certain zoological centres to be exempted from prior authorisation on the basis of an assessment of their 'health risk' introduces a high degree of administrative discretion, since objective, homogeneous and verifiable criteria for such an assessment are not established. This indetermination may lead to an uneven application of the rule and, in practice, allow activities with a relevant impact on animal health, biosecurity or animal welfare to be subject only to the responsible declaration system, without an effective prior check by the administration. Given that zoological centres involve the keeping and handling of animals with a potential impact on public and animal health, it is necessary to strengthen preventive control mechanisms, preventing the responsible declaration from becoming a general route to activity without sufficient guarantees. Proposed amendment:	Not acceptable. The legislation must allow the Autonomous Communities the necessary scope for implementing legislation.

		Deletion of paragraph 2.	
	Catalonia. General Direction of Agriculture i Ramaderia	For: In order to be able to enter NNZZT in the register referred to in Article 14, either for the first time or due to a change of classification... should read: 'due to some modification, because as stated in the current wording, capacity or species extensions are not included.	New wording has been added.
	Catalonia. Department of Territori, Habitatge I Ecological Transitions	- o The possibility to make a self-declaration is established by health risk assessment but nowhere is reference made to a possible assessment of welfare conditions that could also be a cause for this type of authorisation - o The registration is carried out in an Autonomous Community (which receives the declaration of responsibility), is included in the REGA and the zoological centres are not moved within the national territory, so it is not clear why this provision is included. - o Reference is made only to the procedure for amendment, change of ownership and revocation in the case of NNZZ requiring a self-declaration: the cases in which the authorisation can be changed, changed ownership and revoked should be indicated in all forms of authorisation. - o The content of the self-declaration is not established (see Annex VI to the draft Royal Decree on the NNZZ for pet animals).	Since the authorisation scheme derives from Law 8/2003, the grounds for the declaration of responsibility must be solely health grounds, because of the internal coherence of the legal interest protected in the legislation. With regard to the other aspects (including models), they correspond to the regulatory development of the Autonomous Communities.
	Castile and Leon	With regard to the self-declaration, Article 69 (3) of Law 39/2015 states: '3. Self-declarations and communications shall permit the recognition or exercise of a right or the commencement of an activity, from the day on which they are submitted, without prejudice to the powers of verification, control and inspection conferred on public administrations.' As indicated in paragraph 2 of this Article, notwithstanding paragraph 1, the administration will have one month to register you, but in accordance with Article 69 (3) of Law 39/2015, can it start the activity without being registered?	The deadline of the month is for registration, the activity can start immediately by virtue of Law 39/2015.
	AGRIFOOD	ALTERNATIVE WORDING	It is up to the Autonomous

COOPERATIVES	2. Notwithstanding the provisions of the previous paragraph, the competent authorities may exempt certain NNZZTs from prior approval, on the basis of an assessment of their health risk, except in the case of confined or quarantine establishments, <i>school farms or shelters where animals of food-producing species are kept.</i> In this case, they shall be entered in the Register upon submission of the corresponding declaration of responsibility in accordance with Article 69 (3) of Law 39/2015 of 1 October, which shall be addressed to the competent body in whose territorial area the seat of the NZT is located. EXPLANATIONS Given the importance of having these facilities identified and properly authorised for the entire livestock population of our country, we do not consider that a registration system can be established without prior authorisation from the competent authorities.	Communities to assess this aspect.
ROYAL SPANISH HUNTING FEDERATION	It is proposed that the Royal Decree include an express reference to the need for coordination with urban planning legislation, establishing that registration in the register of traditional zoological centres is not automatically subject to a certain urban planning classification in the case of facilities linked to traditional hunting activities, or promoting the classification of these facilities as compatible uses on rural or similar land. Alternatively, provision could be made for the development of common basic criteria to guide the competent authorities in integrating these centres into urban planning legislation, thereby ensuring uniform, proportionate and adapted application to the reality of packs of hunting hounds.	This rule is alien to, and cannot be included in, urban planning legislation, which, moreover, does not fall within the competence of the State.
GENERAL COUNCIL OF VETERINARY COLLEGES	It is considered necessary to specify the documentation to be provided in order to apply for the authorisation of a traditional zoological nucleus. It is proposed to make it compulsory to submit, at least, a description of the activity, plans of the facilities and a technical veterinary report of the zoo. It is also proposed to include an annex in the Royal Decree laying	This corresponds to the regulatory development of the Autonomous Communities.

		down the minimum content of the veterinary technical report.	
	ASELCRE	Registration by means of a self-declaration may be permitted only in exceptional cases, in cases of very low risk and subject to strict regulatory limits , such as private collection centres or those keeping a special protection animal under a companion regime, and may not be used to move the general system of prior authorisation routinely in activities with a significant impact on health, traceability or animal welfare.	This corresponds to the regulatory development of the Autonomous Communities.
	INTERCIDS	It is proposed to clarify the control and supervision criteria, establishing specific procedures, measurable standards and precise documentation for operators, so as to reduce discretion, ensure consistency in inspection and ensure legal certainty and compliance with the Royal Decree.	This corresponds to the regulatory development of the Autonomous Communities.
Article 16. Controls	Susan Bultitude	A rigorous inspection control of the veterinarian should be carried out to ensure the welfare of the hunting dogs.	This is an aspect of the implementation of the standard.
	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	Paragraph 2. <i>'The Ministry of Agriculture, Fisheries and Food, in collaboration with the Autonomous Communities and Cities, shall implement coordination mechanisms to ensure that this Royal Decree is applied uniformly throughout Spain. On-the-spot checks shall be coordinated by means of the specific control programmes applicable depending on the establishment or by reason of the matter concerned and, failing that, by means of the National Programme for the Official Control of Hygiene in Primary Livestock Production.'</i> The following should be added: 'These inspections shall always be unannounced and never pre-notified to the NNZZT for whom they are intended'.	Inspections shall be carried out as decided by the competent authority, as part of the national control plan provided for in this provision, it cannot be established as a basic rule how they shall be carried out.
	THE COMMUNITY OF MADRID	Drafting proposal: <i>2. The Ministry of Agriculture, Fisheries and Food, in collaboration with the autonomous communities and cities, shall implement</i>	Not accepted, a residual clause should be provided so that there is no regulatory gap.

		coordination mechanisms to ensure that this Royal Decree is applied uniformly throughout Spain. The coordination of the performance of on-the-spot checks is it shall do so through the specific control programmes applicable depending on the establishment or by reason of the matter concerned and, failing that, through the National Programme for the Official Control of Hygiene in Primary Livestock Production.	
	Regional Government of Valencia	The above-mentioned national programme for the official control of hygiene in primary livestock production is linked to food safety and this type of animal is not intended for consumption.	We do not accept the arguments put forward above with regard to the same claim by the Community of Madrid.
	ASELCRE	The coordination mechanisms provided for in this Article shall include, where appropriate, cooperation with the competent bodies for animal welfare and with the regional and local authorities concerned, in order to avoid duplication, control gaps and diverging solutions for materially related activities.	These aspects will already be considered in the future National Plan.
	INTERCIDS	It is proposed to amend the article to establish clear and objective criteria on the execution of controls, defining frequencies, procedures and documentation required from licence holders, and strengthening coordination mechanisms between administrations in an operational and verifiable manner. This will ensure consistency in inspection, reduce discretion and ensure legal certainty and effective compliance with the Royal Decree.	It is responsible for the regulatory development and implementation of the Autonomous Communities.
	Maxi Lange	The application of controls based on real risk and adapted to the nature of the centres is requested.	This is an indeterminate aspect and does not add anything.
Article 17. Penalties.	Susan Bultitude	Owners of hunting dogs should be sanctioned if they do not care for their hunting dogs in a dignified way.	If infringements are reported, the corresponding penalties will be applied.
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The proposed system of penalties, which refers exclusively to existing legislation such as Law 8/2003, Law 32/2007 and Law 33/2011, is clearly insufficient in terms of deterrent effect, especially in relation to the current reality of the sector and the growing social awareness of animal protection and welfare. The levels of penalties provided for in those rules are, in many	The establishment of a new system of penalties requires legislation with the status of a law.

		cases, low in comparison with the economic benefits derived from certain activities, which may encourage the repetition of unlawful conduct and limit the preventive effectiveness of the system. In this regard, it is considered that the applicable penalty framework is not fully adapted to the current context and the potential seriousness of non-compliances in relation to zoological nuclei, and it is necessary to move towards a system that ensures a proportionate, effective and truly dissuasive response.	
	AGRIFOOD COOPERATIVES	ALTERNATIVE TEXT <i>1. In the event of non-compliance with the provisions of this Royal Decree, the system of infringements and penalties applicable shall apply in accordance with the provisions of Law 8/2003, of 24 April, on animal health, Law 32/2007, of 7 November, on the care of animals during exploitation, transport, experimentation and slaughter, and Law 33/2011, of 4 October, on public health, Law 22/2011, of 28 July, on waste and contaminated soil, Royal Legislative Decree 1/2001, of 20 July, approving the recast text of the Water Law, the recast text of the Law on integrated pollution prevention and control, approved by Royal Legislative Decree 1/2016, of 16 December, or Royal Decree 1945/1983, of 22 June, regulating infringements and penalties in the field of consumer protection and agri-food production.</i> JUSTIFICATION All environmental and, of course, food legislation must be taken into account if the consumption and marketing of the production of these animals is contrary to the standard.	The legislation cites the main laws imposing penalties in this area, it is not possible to list all of them (there are also others on labour infringements, etc.), and Royal Decree 1945/83 is repealed almost in its entirety.
	ASELCRE	The system of penalties shall be applied in full compliance with the principles of criminality, proportionality, legal certainty and ne bis in idem, avoiding duplication of penalties where the same acts may be subsumed under different legislative titles.	It is unnecessary, the principle <i>ne bis in idem</i> is already provided for in Article 31 of Law 40/2015.
	INTERCIDS	It is proposed to reformulate the rule by clearly categorising infringements and establishing objective criteria for the graduation of penalties, differentiating between minor, serious	A Royal Decree cannot amend laws, and less of a basic nature, which must be

		and very serious infringements , in such a way as to ensure proportionality, consistency with the objectives of the Royal Decree and legal certainty.	developed by the Autonomous Communities.
	Maxi Lange	It is requested that sanctions be graduated, differentiating between formal non-compliances and those that pose a real risk, and taking into account the non-profit nature of the centres.	A Royal Decree cannot amend laws, and less of a basic nature, which must be developed by the Autonomous Communities.
First supplementary provision. No increase in staff expenditure.	ADDA ASSOCIATION FOR THE DEFENCE OF ANIMAL RIGHTS	The words <i>'The provisions of this Royal Decree shall not entail any increase in staffing, remuneration or other staff costs'</i> . It should be considered that it may be necessary, in order to guarantee all the measures envisaged, to increase inspections and comply with impartiality, to increase staff or dedication and thus the pay of some workers.	Finding accepted.
	Balearic island	First Additional Provision: 'no increase in expenditure' not adjusted to material reality; delete The introduction of the register, controls, adaptation of registers (DA 2a) and new documentary obligations materially increase the workload of the Autonomous Communities' official veterinary services. We would ask that this be deleted as it is not sustainable in terms of management.	Finding accepted.
	Regional Government of Valencia	Delete it	Finding accepted.
	CEVE	3.8 permanent establishments housing animals used for specific sporting and professional activities, add "other than dogs, cats or ferrets" (These issues are already included in the RD project on Zoological Numbers of Pet Animals being processed by the Ministry of Social Rights, Consumer Affairs and Agenda 2030).	We do not accept this, as we have explained that this duplication will be corrected.
	ASELCRE	It is not acceptable, either from the regulatory technique or from the principles of good administration, to claim that there is no budgetary impact where the rule itself generates functional duplications, multiplies control points and widens administrative intervention.	Finding accepted.
	ARRECAL	It does not seem correct to state that the application of the rule will not lead to an increase in allocations, remuneration or other staff costs, on the basis of the arguments set out above.	Finding accepted.

Second supplementary provision. Adaptation of registers.	THE COMMUNITY OF MADRID	Drafting proposal: <i>The competent authorities must, within six months of the publication of this Royal Decree, update the information in the NNZZT register in accordance with Article 3, making the necessary arrangements.</i>	Finding accepted.
	Catalonia. Department of Territori, Habitatge I Ecological Transitions	May not be completed or adapted within 6 months	Finding accepted.
	ASELCRE	The wording 'enabling the necessary mechanisms to be put in place for this purpose' shows that a regulatory rule is undetermined and places an open and unjustified organisational and budgetary burden on the administrations concerned. Moreover, the forecast is in direct contradiction with the alleged absence of any increase in expenditure declared in the first additional provision.	This is merely a mandate for action, which will ultimately take the form of IT actions.
Third supplementary provision. Write-offs.	ASELCRE	The third additional provision provides for automatic removal from the register, which is incompatible with the principles of legal certainty and sound administration, in that it provides for removal from the register without a procedure, without individual verification, without a hearing and without notifying the persons concerned.	The deregistration stems from the fact that the establishment will no longer be governed by this rule, must be automatic, there is no impairment of any right, nor is there a subjective 'right' to remain registered under a rule that is not applicable to a specific subject. Without prejudice to this, a new, clearer wording has been added <i>to the procedure</i> for this purpose, which allows citizens' right of appeal to be duly guaranteed.
First transitional provision Registration and approval of establishment	ELEVEN FOUNDATION OF THE GUIDE DOG	<i>The wording of the provision should preserve the regime for assistance dog training centres, as assistance dogs have their own special regime, regulated by regional rules. We understand that the regime of entities engaged in the training of assistance dogs should be preserved, and that it should continue to be governed by the regulations approved by the competent administration and be in line with the international standards of the International Federation of</i>	We accept, with a new paragraph: 'The provisions of this transitional provision shall not apply to NZTs hosting assistance dogs regulated by Royal Decree 409/2025 of 27 May 2007, which may maintain

S.	<i>Guiding Dogs (IGDF) and International Assistance Dog (ADI). On the other hand, limiting the number of animals to be housed in a NZT of an assistance dog training centre would run counter to the inclusion of persons with disabilities in those providing support and autonomy. By including these centres as NZT without distinction, they do not take into account parameters such as the area of the centres for the care and training of assistance dogs, for example, and the human and material resources made available to them, in accordance with international standards for the approval of their activity.</i> <i>It is therefore proposed that it be worded as follows:</i> <i>(b) Notwithstanding the provisions of Articles 14 and 15, establishments already entered in the register referred to in Article 14, or those already authorised in accordance with Article 36 of Law 8/2003 of 24 April, or Decree 1119/1975 of 24 April, on the approval and registration of zoological centres, equalisation establishments, centres for the promotion and care of pets and the like, shall maintain such registration or authorisation, without prejudice to the fact that those which have a higher census than that established in Annex I at the time of entry into force of this Royal Decree may temporarily maintain their capacity but may not allow the entry of new animals until they comply with the maximum capacities permitted in Annex I. With the exception of those NZTs in which activities subject to their own legal regime are carried out, which shall be governed by their applicable legislation.</i> Comment ON THE PROPOSAL TEXT – As set out in Article 5 of Royal Decree 409/2025 of 27 May 2014 regulating the activity and welfare of assistance dogs: Article 5. Training of the assistance dog. 1. Assistance dogs shall be trained for the performance of their duties by autonomous entities or professionals specialised in education, socialisation and training of assistance dogs, and accredited or recognised by the Autonomous Communities and the cities of Ceuta and Melilla. 2. The Autonomous Communities and the cities of Ceuta and Melilla shall determine the conditions that training bodies must meet in order to be accredited or recognised, as regards	their existing capacity.'
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		professionals, technical conditions and, where appropriate, appropriate facilities and services for the training, delivery and follow-up of assistance dogs.	
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The wording of the provision introduces a significant ambiguity by referring specifically to ‘establishments for the practice of equalisation’, without clarifying whether that category includes other establishments which house or use equidae for different purposes, such as therapeutic, breeding or other activities. This lack of precision may lead to different interpretations and the undue exclusion of certain centres from the planned scheme, creating legal uncertainty and making it difficult to apply the rule uniformly. Proposed amendment: <i>establishments for the practice of equalisation and any establishment which hosts or uses equidae, irrespective of the activity carried out, including, inter alia, centres for assisted therapy, breeding or pupil...</i>	This is the wording in accordance with Decree 1119/1975.
	Regional Government of Valencia	It should be borne in mind that not only is it sufficient that no new animals are brought in, but it should also be stated that they do not breed until they meet the established maximum capacity, which is not possible in pigeons and other classifications.	It is not necessary to reach such a level of detail, the fact is that no new animals may enter until the census has been brought back to the maximum permitted.
	ASELCRE	The provision at issue only appears to maintain pre-existing authorisations, since it imposes an immediate ban on the entry of new animals into establishments that exceed the new thresholds in Annex I. This constitutes a supervening, intense and disproportionate restriction on previously authorised activities , undermines legal certainty and legitimate expectations, and jeopardises the economic viability of the centres concerned without establishing a genuine transitional adjustment regime.	Animal limits are tightened for animal health reasons, as are capacity limitations for livestock production or breeding farms.

	INTERCIDS	It is proposed that the provision be amended to establish a mandatory adaptation plan, with specific deadlines and supervision by the competent authority , so that establishments adjust their capacity to the permitted limits without compromising the safety and welfare of the animals, thus ensuring regulatory consistency and legal certainty for all NZT operators.	Corresponds to the regulatory development of the Autonomous Communities;
Second transitional provision: Skills and distance.	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	With regard to the capacities existing at that time... within 1 year, they shall be adapted to the capacities referred to in this Royal Decree.	Corresponds to the regulatory development of the Autonomous Communities;
	ELEVEN FOUNDATION OF THE GUIDE DOG	The wording of the provision should preserve the regime for assistance dog training centres, as assistance dogs have their own special regime, regulated by regional rules. We understand that the regime of entities engaged in the training of assistance dogs should be preserved, and that it should continue to be governed by the regulations approved by the competent administration and be in line with the provisions of the international standards of IGDF and ADI. It is therefore proposed that it be worded as follows: <i>Notwithstanding the provisions of Article 1 and Annex I, as well as Article 6, NNZZTs authorised or registered at the entry into force of this Royal Decree may maintain existing capacities at that time, but under no circumstances exceed them; they shall be exempt from compliance with the distances referred to in Article 6. With the exception of those NZTs in which activities are carried out under their own legal regime, which will be governed by their implementing legislation.</i> Comment ON THE PROPOSAL TEXT – As set out in Article 5 of Royal Decree 409/2025 of 27 May 2014 regulating the activity and welfare of assistance dogs: Article 5. Training of the assistance dog. 1. Assistance dogs shall be trained for the performance of their duties by autonomous entities or professionals specialised in education, socialisation and training of assistance dogs, and accredited or recognised by the Autonomous Communities and the cities of Ceuta and Melilla. 2. The Autonomous Communities and the	Finding accepted.

		cities of Ceuta and Melilla shall determine the conditions that training bodies must meet in order to be accredited or recognised, as regards professionals, technical conditions and, where appropriate, appropriate facilities and services for the training, delivery and follow-up of assistance dogs.	
	ASELCRE	The second transitional provision introduces a dual system which is difficult to justify by allowing pre-existing establishments to maintain their capacities and to be exempted from the distances laid down in Article 6, whereas it imposes the same requirements entirely on other operators. The general distance exception weakens the substantive justification for that requirement, and the absolute freezing of historical capacity constitutes an additional, rigid and disproportionate limitation, unconnected with the actual conditions of each establishment.	Not accepted, the rule cannot be applied retroactively in aspects that are detrimental to citizens.
Third transitional provision: Deadline for adaptation	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	Change the proposed timeframe from 2 years to 1 year	Not accepted, sufficient period should be foreseen.
	Balearic island	Article concerned: DT 3a and also DT 1a/DT 2a by connection. The project gives 2 years to adapt facilities (Art. 7), but does not clarify the encoding/registration status (REGA/NZT) during transit, especially with the coexistence of the REGA register extended to NZT. Drafting suggestion (add a point in DT 3a) <i>‘they shall have a period of 2 years. During that period, they shall maintain their registration code in force at the time of entry into force, without prejudice to their formal reclassification as NZT in the register, at a time and in a form to be determined by the competent authority, ensuring continuity of traceability and official control.’</i>	It is not accepted, it is a matter for the regulatory development of the Autonomous Communities that deem it appropriate.
	ASELCRE	The third transitional provision lays down a uniform period of two years for adaptation to Article 7 without justifying its adequacy or	Not accepted, sufficient period should be foreseen.

		distinguishing between obligations of a different nature, complexity and cost. This renders it incompatible with the principles of proportionality, legal certainty and good regulation, especially when it concerns previously authorised establishments which may be required to undertake substantial material and financial adaptations.	
	Maxi Lange	We would ask for a distinction to be made between administrative and structural requirements, establishing a minimum period of five years that can be extended to seven years, with the possibility of justified extension.	Not accepted, sufficient period should be foreseen, but not so long as to amount to a <i>de facto</i> waiver.
	ARRECAL	The two-year deadline for adapting to the conditions of Article 7 is considered to be absolutely insufficient. The Royal Decree on pet animals provides for a transitional period of FOUR YEARS, therefore it is proposed to align the two periods.	Not accepted, sufficient period should be foreseen, but not so long as to amount to a <i>de facto</i> waiver.
Sole repeal provision. Repeal of regulations	Catalonia. Department of Territori, Habitatge i Ecological Transitions	It may not be repealed until the rules on zoological centres for pet animals have entered into force.	The entry into force of both Royal Decrees will be coordinated.
	ASELCRE	The proposed repeal is premature, incomplete and potentially creates regulatory gaps , in so far as the new Royal Decree does not provide a clear, homogeneous and sufficiently developed replacement of all the regulatory elements that had hitherto been covered by the repealed legislation.	The transitional periods are sufficient, the previous rules cannot be left applicable.
First final provision Amendment of Royal Decree 479/2004 of 26 March 2015 establishing and regulating the General Register of Livestock Holdings.	THE COMMUNITY OF MADRID	Drafting proposal. Three. The title of Article 3 and paragraph 1 thereof shall read as follows: 'Article 3. <i>General register of livestock holdings and traditional zoological centres (REGA-NTZ)</i>	Finding accepted.
	Marta Esteban Miñano, Animal Guardians Foundation Spain	Deletion of references to permanent establishments housing animals used for specific sporting and professional activities	They are animals to which Law 7/2023 does not apply.
	CEVE	3.8 permanent establishments housing animals used for specific sporting and professional activities, add "other than dogs, cats or ferrets" (These issues are already included in the RD project on Zoological Numbers of Pet Animals being processed by the Ministry	These are animals to which Law 7/2023 does not apply, and the duplication of projects will be corrected.

		of Social Rights, Consumer Affairs and Agenda 2030).	
	FOUNDATION FOR ANIMAL ADVICE AND ACTION	Proposed amendment Deletion of references to permanent establishments housing animals used for specific sporting and professional activities	These are animals to which Law 7/2023 does not apply, and the duplication of projects will be corrected.
	Regional Government of Valencia	Allegation: It is proposed to add three more types of holdings for the reasons explained above: — Non-commercial or leisure equine holdings — Equestrian practice holdings – Concentrations of equestrian horses for competition or playful/cultural purposes	It is not accepted for the reasons already set out above with regard to the Community's claim to Article 3.
	Catalonia. Department of Territori, Habitatge i Ecological Transitions	In addition to amending the title, it should include an article stating that there will not be 2 registers in the REGA and NNZZT registers, but only one.	It is unnecessary.
	INTERCIDS	It is proposed to amend the first final provision, in particular the definition of “traditional zoological centres” and the listing of types of establishments in Annexes III and IV, to expressly exclude establishments housing pet animals , whether they carry out activities for educational, sporting, professional or other purposes. A clarification should also be included that owners of establishments keeping pets are exclusively subject to the specific rules applicable to those animals , avoiding duplication, conflicts of interpretation and possible administrative overload, thus ensuring regulatory consistency, legal certainty and ease of supervision for the competent authorities.	They are animals to which Law 7/2023 does not apply.
	Castile and Leon	With regard to the amendment to point 2.3: Does the type of holding ‘Other leisure holdings’ cease to exist without it being possible to register holdings with livestock species other than poultry (such as sheep, goats, alpacas, etc.) as private collections under the NNTT? How do we reclassify these farms that keep species other than poultry if their animals and products do not enter the food chain? Keeping both poultry and other livestock species will result in the current authorisation being split.	The wording has been amended, specifying the educational establishments and removing the requirement of openness to the public. For the rest, the classification will depend on the species (and will be REGA or NZT holdings). It

		— Does the type of holding “Educational centre” disappear? There are not only registered farms in private schools, there are universities with different species, not just equidae, and agricultural training schools under the responsibility of the AC. For those species that pass their production or animals into the food chain, should they be reclassified as breeding production, and for which a second registration code for RNNZZ-Granja Escuela should not be authorised for the same location and holder? This leads to the need to split the current authorisation. — See also the commentary on Article 3 and the ‘Private collection of birds’. It appears that the classifications in Article 3 of this draft RD become type of holding instead of “zoo nucleus class” or “zootechnical classification”. Will this also be the case in the database? Yes, you may be complicit in the current regional registers, when different activities for different species have currently been authorised under the same code. For example, ‘restocking and breeding with placing on the market of falconry birds’, ‘restocking and private collection of hens, rabbits, cats’, ‘falconry and private collection of psittaciformes birds’, ‘falconry + breeding of dogs + collection of captive birds’, ‘residence/shelter and private collection of goats’, ‘private collection of birds other than pets, when they also have birds included in Annex I to the Regulation’, ‘colombophilia and private collection of birds other than pets’ and the competent authority in the Autonomous Community of the registers of traditional zoos coincides with that of the register of zoos of pets. — In relation to quarantine establishments in Delegated Regulation (EU) 2019/2035’: Are those keeping livestock species not registered given that this type of establishment is not included in section 2 of Annex III? Who is the competent authority in your health authorisation prior to registration in REGA or RNZTT? Did MAPA (previously authorised by MAPA)?	has already been clarified what is the type and classification of zootechnical species in the database.
	ASELCRE	The proposed amendment is not limited to a minor technical adaptation, but substantially alters the nature, scope and function of	The proposed regulation is consistent and avoids

		a register originally designed for livestock holdings, extending it to heterogeneous realities with very different purposes, typologies, risks, legal regimes and control needs. This extension is not sufficiently justified from either a functional or an organisational point of view.	regulatory dispersion.
	FAPAM ANIMAL JUSTICE	Proposed amendment: Deletion of references to permanent establishments housing animals used for specific sporting and professional activities	They are animals to which Law 7/2023 does not apply.
	Animal Compassion Sanctuary Association Animal Protective Association Saving Bumped Animals	We suggest the following wording: <i>3.4. Sanctuaries or zoological centres for animal protection that have lost their productive purpose, on a permanent or temporary basis, and which may be considered as pets in accordance with the provisions of the legislation in force.</i>	These are animals to which Law 7/2023 does not initially apply, and even if they are considered to be pets, their registration as a NZT must be maintained, and the animal health legislation applicable to them depends on the species, not on whether they are considered to be pets or production animals.
Second final provision Amendment of Royal Decree 1547/2004, of 25 June, laying down rules for the organisation of rabbit farms.	Castile and Leon	<i>Article 3 (zotechnical classification of rabbit farms) of this RD defines: "4a pet farms: these are farms that breed animals of the 'Leporidae' family for use as pets for commercial purposes." If they are admitted to the positive list of pet animals, are they still recorded as holding of Zotechnical Production and Classification "Pet Breeding Holdings"? Or does it come under another standard (in which case it should be taken into account when developing the standard in question)? Will it be amended in another standard?</i>	Depending on the future inclusion rule as pets, nothing can be foreseen in this project.
	AGRIFOOD COOPERATIVES	ALTERNATIVE TEXT <i>(c) Traditional zoological nuclei of animals, with the exception of school farms and shelters, as defined in Article 2 (2) of Royal Decree XXX/XXXX establishing basic animal health standards, authorising and registering traditional zoological nuclei of animals and amending several standards.</i>	Not all of the legislation can be applied to non-food producing establishments; the relevant legislation will apply to them.

		EXPLANATIONS <i>School farms and zoological centres which keep domestic animals and which have specific applicable sectoral legislation must comply fully with all the requirements, obligations and requirements laid down in that legislation. This compliance not only responds to a question of legality, but also to the need to ensure adequate conditions in terms of animal welfare, health, biosafety and administrative control, all of which are essential in any facility housing animals, regardless of their productive, educational or recreational purpose.</i>	
Final provision 3. Amendment of Royal Decree 1082/2009 of 3 July 2007 laying down animal health requirements for the movement of animals from hunting, inland aquaculture and zoological centres, as well as wild animals.	Susan Bultitude	The care, protection and treatment of hunting dogs should be improved	This is not an observation as such.
Fourth final provision Amendment of Royal Decree 804/2011 of 10 June 2007 regulating the zootechnical, health and	Catalonia. General Direction of Agriculture i Ramaderia	If paragraph 2.2.4.1 of RD 804/2011 (educational establishment) is deleted, it is understood that this is done because the concept of 'farm school' is now referred to as NZT. Is it to be understood that a veterinary faculty with equidae for educational purposes is to be regarded as a school farm? We consider it more appropriate to keep the name of educational establishments, deleting it from RD 804/2011, but it should be added in this NZT RD to the section on farm school, changing the heading from 'farm school' to 'educational establishments'.	Finding accepted.

animal welfare organisation of equine holdings and establishing the equine health plan.	Regional Government of Valencia	It is proposed to add three types of holdings to be deleted from RD 804/2011: “.... (c) 2.2.12 Reception or collection centres for abandoned equidae. (d) 2.2.4.4 Farms for equestrian training (e) 2.2.4.5 Non-commercial operation (f) 2.2.3.1 Concentrations of competition	It is not accepted for the reasons already set out with regard to the same related comment from the same Autonomous Community, Article 3 and the first final provision.
	Castile and Leon	Educational establishments (which so far included farms, schools in equidae) do not usually keep only equidae, but often keep different species, some of which produce, for example, eggs in the case of poultry and which in certain establishments end up in the food chain. On the other hand, there are registered universities that keep equidae and other livestock species as an educational centre, as well as agricultural schools under the authority of the Autonomous Community, not just farms and private schools. 5	Finding accepted.
Fifth Final Provision. Amendment of Royal Decree 138/2020 of 28 January 2007 laying down the basic rules on health measures for game species acting as a reservoir for tuberculosis (Mycobacterium tuberculosis complex).			Appropriate aspects should apply to these centres, always assuming that they are holdings of animals not intended for human consumption.
Sixth final provision. Amendment of	AGRIFOOD COOPERATIVES	ALTERNATIVE TEXT “(c) Traditional zoological nuclei of animals, with the exception of school farms and shelters , as defined in Article 2 (2) of Royal	

Royal Decree 306/2020 of 11 February 2007 laying down basic rules for intensive pig farms and amending the basic rules for extensive pig farms.		<i>Decree XXX/XXXX laying down basic animal health standards, authorising and registering traditional zoological nuclei of animals and amending several standards."</i> EXPLANATIONS School farms and zoological centres which keep domestic animals and which have specific applicable sectoral legislation must comply fully with all the requirements, obligations and requirements laid down in that legislation. This compliance not only responds to a question of legality, but also to the need to ensure adequate conditions in terms of animal welfare, health, biosafety and administrative control, all of which are essential in any facility housing animals, regardless of their productive, educational or recreational purpose.	
Seventh final provision. Amendment of Royal Decree 637/2021 of 27 July 2007 laying down the basic rules for the management of poultry farms.	AGRIFOOD COOPERATIVES	ALTERNATIVE TEXT (c) Traditional zoological nuclei of animals, with the exception of school farms and shelters, as defined in Article 2 (2) of Royal Decree XXX/XXXX establishing basic animal health standards, authorising and registering traditional zoological nuclei of animals and amending several standards.	Same as above.
Eighth final provision. Amendment of Royal Decree 787/2023 of 17 October 2007 laying down provisions to regulate the traceability, identification	FOUNDATION FOR ANIMAL ADVICE AND ACTION	The proposed amendment raises significant doubts regarding the integration of systems for identifying animals of production species that are being kept outside the production chain, especially in sanctuaries. In particular, it is unclear whether the usual identification systems in these species (such as microchip or intraruminal bolus in cattle, sheep or pigs) allow their registration in pet registers, and how their traceability should be managed in these cases. This lack of clarity can make it difficult to correctly identify and register these animals, creating administrative gaps and	An identification provided for in EU legislation cannot be changed.

and registration system for certain species of kept terrestrial animals.		coordination problems between registers. There are also doubts as to the possibility of using alternative identification systems for certain species, such as poultry, and their possible equivalence to other systems already approved for pet birds, which demonstrates the need for clearer, more uniform rules adapted to the different circumstances.	
	Castile and Leon	In all the articles referred to as ‘for cultural, historical, recreational, scientific or sporting reasons and for those... residing in confined establishments or traditional zoological centres...’, the wording should be improved within the meaning of Regulation (EC) No 2019/2035, according to which: In order to allow, for example, the identification of ovine animals of the mouflon morphotype on holdings of the type Production of breeding intended for release in hunting grounds for hunting with an injectable transponder and without an ear tag, as currently drafted, it is not understood that they can be derogated from. This could also apply to bovids whose use is to participate in shooting or trapping exhibitions, but who share their location with the breeding activity, this being the main activity of the farm. — It is proposed, for example, for bovines: “(b) For those bovine animals held in: — confined establishments, — traditional zoological centres, — or which are kept on breeding holdings for the purpose of participating in cultural or traditional exhibition activities (such as draught or draught exhibitions), for cultural, historical, recreational, scientific or sporting reasons, and at the request of the holder to the competent authority, the authorised means of identification may be only ruminal bolus or injectable transponder, the qualification required for the application of the latter being that of a veterinary graduate. The competent authority shall establish a procedure for the management and granting of the authorisations referred to in paragraphs (a) and (b).’ — For sheep/goats: “(b) for ovine and caprine animals kept in:	Finding accepted.

		— confined establishments, — traditional zoological centres, — or which are kept on breeding holdings for the purpose of participating in cultural or traditional exhibitions or hunting activities, for cultural, historical, recreational, scientific or sporting reasons, and at the request of the holder to the competent authority, the authorised means of identification may be only the ruminal bolus or the transponder injectable into the right metatarsus, the qualification required for the application of the latter being that of a veterinary graduate. The competent authority shall establish a procedure for the management and granting of the authorisations referred to in this paragraph.'	
	Animal Compassion Sanctuary Association Association for the Protection of Animals Saving Worlds	In paragraphs 1, 2 and 3, it is proposed to amend the wording as follows: <i>For:</i> <i>“For cultural, historical, recreational, scientific or sporting reasons...”</i> <i>Read:</i> <i>“For cultural, historical, recreational, scientific, sporting or animal protection and welfare reasons...”</i>	There is no need to mention these criteria, which are not covered by EU legislation.
Tenth final provision. Competence.	MITECO	In accordance with the tenth final provision of the proposed legislation, <i>‘the provisions of this Royal Decree shall have the character of basic State legislation, in accordance with the provisions of Article 149.1, Rules 13 and 16 of the Spanish Constitution, which confers on the State exclusive competence with regard to, respectively, the bases and coordination of the general planning of economic activity, and the bases and general coordination of health’.</i> This provision differs from the provisions of the MAIN, which states that ‘This Royal Decree is issued under Article 149 (1), Rules 13, 16 and 23 of the Spanish Constitution, which confer on the State	Finding accepted.

		exclusive competence with regard to, respectively, the bases and coordination of the general planning of economic activity, the bases and general coordination of health, and basic legislation on environmental protection’. It is considered that, since animal welfare is concerned and since the aim is to reduce the risks that the activities of establishments housing animals may pose to humans, the environment or other animals. Article 149 (1.23) (a) CE should be included in the title. Furthermore, in this report it has been pointed out that some of the rules amended by this draft are based, in addition to the aforementioned Rules 13 (a), 16 (a) and 23 (a) of Article 149 (1), on other areas of competence, and it is therefore considered appropriate to amend the tenth final provision in order not to affect the classification of those rules of competence. Accordingly, a wording similar to the following is proposed for the tenth final provision: <i>‘The provisions of this Royal Decree shall have the character of basic State legislation, in accordance with the provisions of Article 149.1, Rules 13, 16 and 23 of the Spanish Constitution, which confers on the State exclusive competence with regard to, respectively, the bases and coordination of the general planning of economic activity, the bases and general coordination of health and basic legislation on environmental protection.</i> <i>The royal decrees that are amended in the first to ninth final provisions of this royal decree shall continue to be based on the powers expressed therein.’</i>	
	ASELCRE	Review of the final provision on competence and, in particular, the clarification of the basic nature of those provisions that go beyond the establishment of health bases or general coordination and go into aspects of organisational, procedural and executive detail specific to the sphere of competence of the Autonomous Communities.	Not accepted, the rule is consistent with the jurisdictional titles on which it is based, and with the doctrine of the Constitutional Court.

Eleventh final provision. Power of amendment	ASELCRE	The authorisation for the head of the ministry to amend the content of the annexes is excessively open, since it does not distinguish between mere technical adaptations to EU legislation and amendments of substantive scope. Given that the regulatory power lies with the Government in accordance with Article 97 EC and Law 50/1997, and that the regulation must comply with the principles of legal certainty and good regulation of Law 39/2015, a general reference allowing material elements of the regime established in the Royal Decree to be altered by ministerial order is not permissible.	The amendment is only intended to bring it into line with EU legislation.
Twelfth final provision. Entry into force.	Castile and Leon	With regard to the exception of entry into force, the wording 'existing establishments that intend to be reclassified' seems to limit automatic registration. It would be better to give them time to comply with specific articles.	For existing ones a period of two years is already foreseen, this is for those who wish to change classification within the NZT.
	ASELCRE	Entry into force on the day following publication and immediate application from the same date are disproportionate and inconsistent with the actual content of the Royal Decree, which imposes new registration, functional and adaptation obligations on establishments and administrations. The one-year derogation for establishments seeking to be reclassified confirms, moreover, that the rule is not applicable instantaneously, but articulates that need for a time limit in a partial, indeterminate and insufficient manner, compromising legal certainty and the coherence of the transitional regime.	Not accepted, due transitional period (reaching 2 years) is foreseen.
Annex I Maximum permitted capacities, by species, for certain types of traditional zoological nuclei	Alberto Díez Michelena/National Association for the Defence of Animals (ANDA)	— Change title: Minimum surface areas and maximum capacities... — Add a further heading: For the NNZZT established in section 3.1.h, the following minimum enclosure areas per animal are established: 1) height of the cross less than 30 cm: 4 square mts per dog and 3 square mts per additional dog . height of cross between 30 and 39 MLC: 4 MTS per dog and 3,5 mts for each additional dog . height of cross between 40 and 59 MLC: 5 MTS per dog and 4 mts per additional dog . height of cross between 60 and 70 MLC: 8 MTS per dog and 5 mts	This corresponds to the regulatory development of the Autonomous Communities.

		per additional dog crossed height of more than 70 MLC: 10 mts per dog and 6 mts for each additional dog The enclosure shall always be at least 2 metres high. If dogs of different height are housed in the same compartment, the dimensions for the highest animal shall be taken into account. (2) the minimum area for housing each dog shall include: a. A covered rest area with sufficient enclosure to provide adequate thermal insulation. b. A recreational area, whether covered or not, which shall not replace spaces suitable for exercise by animals.	
	Susan Bultitude	Adequate space should be provided for hunting dogs	This is not a remark.
	Artemisan Foundation	Annex I sets a maximum limit of 50 dogs per zoo nucleus. This limitation is not considered reasonable, as the number of animals housed should depend on the area, facilities and conditions of the zoo nucleus, and not on a rigid numerical limit. There are also cases where several packs of hunting hounds can be housed in the same municipal zoological centre, as is the case in some municipalities where the municipality has common facilities. It is therefore proposed to replace the fixed limit with a criterion based on: - available area - animal welfare conditions - capacity of installations determined by the competent authority.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	Official Chamber of Veterinary Surgeons of Murcia	Annex I lays down maximum animal limits for certain categories of traditional zoological nuclei. However, the technical or health criterion used to determine those limits is not made explicit. In particular, these limits do not appear to be linked to objective parameters such as minimum area per animal, animal density or biosecurity conditions.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	Balearic island	Annex I: maximum capacities without risk assessment; review or delete	This number is established for animal health reasons, as it is

		The preamble itself refers to maximum capacities for biosecurity, but the Annex does not justify the technical criterion. Furthermore, making the scope (Art. 1.2) conditional on an annex without risk assessment may produce arbitrary effects. Drafting proposal (amendment of Art. 1.2 and Annex I) Keep annex but carry out risk assessment from both health and management point of view).	estimated that there is a high health risk due to the concentration of animals above the limit. However, it may be revised on the basis of a proposal from the RASVE Committee, for example.
	CEVE	Delete point 12. Dogs used in specific and professional activities: 50 animals (These issues are already included in the draft Royal Decree on the Zoological Numbers of Pet Animals currently being processed by the Ministry of Social Rights, Consumer Affairs and Agenda 2030)	As explained above, this regulatory duplication will be corrected.
	Catalonia. Department of Territori, Habitatge i Ecological Transitions	Maximum capacities per species not justified on a clear technical basis. Allow derogations with reasoned authorisation. For example, to be taken into account in captive breeding centres for endangered bird species. Some limitations are not clear. For example, is the limitation to a maximum of 10 minks understood as only affecting zoos displaying minks, but would not affect conservation programmes? Can a mink breeding centre have more than 10 as they are not included in any category of Traditional NNZZ?	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit. On the other hand, a mink breeding centre is a production livestock holding, not a NZT.
	Castile and Leon	— By using “.. <i>by number of animals according to species...</i>” and not also referring to “following groups of species”: - o In camelids, could there be 50 alpacas + 50 camels +...? Or 50 camelid animals in total? - o Equidae: could we have 50 asses + 50 horses + 50 zebras? ‘Beekeeping species’ is cited in the plural, indicating a maximum of 5 hives, which could be equal to the criterion of self-consumption of 15 hives. — There is no reference to the number of ferrets, when it is made for dogs used in specific and professional activities.	The rule is clear, the cap is per species.

		— For dogs involved in sporting activities, 50 are given, as already reported, with figures no higher than this figure: It would be more appropriate to speak of LU rather than the number of animals. In addition, establishing equivalences of LUs would make it easier, for example, to have a definition of 'Reduced Establishment' for which to require them to communicate their registration in the register, but to be able to exempt them from other requirements.	
	Aragon	It is considered that the limit on animals for collection and jaury should be removed and no upper limit should be set. Delete paragraph 12.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	AGRIFOOD COOPERATIVES	With regard to the maximum capacity of these facilities, we consider the number of animals that can be kept in them to be completely disproportionate. It can be understood that in certain facilities such as zoological parks the number may be higher, but it cannot be generalised to other facilities. In the case of domestic food-producing species, these facilities have the possibility to register as livestock facilities. On the other hand, there is no limit to mixed holdings or holdings with different animal species. These figures should be very significantly reduced by setting an overall maximum number of animals, especially of food-producing species: — Cattle, sheep, goats, pigs up to a maximum of 10 animals. — Rabbits/hares: 15 animals. — Fowls of the species <i>Gallus domesticus</i> and turkeys: 20 animals. — In the case of beekeeping, this possibility should be removed. All beehives must be registered with a REGA code within the scope of Royal Decree 209/2002 of 22 February laying down rules for the organisation of beekeeping holdings.	The number is fixed for health reasons, but it cannot be required to be registered as a production livestock holding, as the animals or their products are not intended for human consumption.

	ROYAL SPANISH HUNTING FEDERATION	Section 12. It is well known that there are numerous legally established packs of hunting hounds that far exceed 50 dogs. This has not, per se, been a problem from a health or animal welfare point of view, as these facilities are subject to specific checks and specific sectoral regulations. From this point of view, the imposition of a uniform ceiling unconnected with the actual conditions of handling, facilities and health control introduces an artificial and disproportionate restriction, which does not meet either accredited technical criteria or the real needs of the sector. It is therefore considered that the provision contained in Annex I should be deleted in its entirety, as it is neither appropriate nor necessary for achieving the objectives of the legislation. In the alternative, and in the event that it is considered essential to maintain a reference to maximum capacities, it is proposed that the limit laid down for dogs used in specific and professional activities be raised to a maximum of 200 specimens, so that it is adapted to the current situation in the sector and allows activities such as packs of hunting hounds to take place normally, without imposing unjustified restrictions.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	GENERAL COUNCIL OF VETERINARY COLLEGES	Annex I sets maximum animal limits, which in our view are too high, for certain categories of traditional zoological nuclei. However, the technical or health criterion used to determine those limits is not made explicit. In particular, these limits do not appear to be linked to objective parameters such as minimum area per animal, animal density or biosecurity conditions. It is therefore proposed to revise these limits or link them to technical parameters that allow the maximum capacity of animals to be adapted to the actual conditions of the facilities.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	ASELCRE	The annexes are based on a logic of separation into different centres which does not correspond to the functional reality of many establishments, which operate as a single unit of ownership, management, facilities, staff, biosafety and health control. The diversity of species or activities within a single centre does not in	The annexes are consistent with the structure of the standard.

		itself justify their fragmentation in terms of registration or classification, and doing so leads to administrative duplication, greater documentary burdens and redundant inspections without any real improvement in control.	
	EXTREMADURA HUNTING FEDERATION	Paragraph 12. To extend the maximum capacity on an unlimited basis for establishments keeping packs of hounds or hounds , provided that they have sufficient and necessary conditions to accommodate that number of dogs.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	INTERCIDS	It is proposed to delete paragraph 12 on “Perros used in specific and professional activities: 50 animals” , as their inclusion contradicts the intention to exclude any establishment keeping pets from traditional zoological centres.	They are animals excluded from the scope of Lye 7/2023.
	My friends the pigeons	The maximum number of animals should be in line with the space and resources of the NZ and not with a fictitious limit when this is not set on livestock holdings for consumption.	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.
	ANPROGAPOR	We completely oppose the exemption of zoological centres from the biosafety and health obligations laid down in Royal Decree 306/2020 laying down the rules for intensive pig farms from 3 to 50 pigs. We therefore request that the text be amended and propose the following: Zoological centres with fewer than 3 pigs must meet the biosafety, hygiene and animal health requirements laid down in the category ‘holding for own consumption’ in Royal Decree 306/2020. Zoological centres of 3 to 50 animals must comply with the requirements of Article 4 (responsibilities for training, biosafety, hygiene and animal welfare) and Article 5 (conditions relating to biosafety, infrastructure, equipment and handling) of RD 3036/2020, which apply to small farms.	These are installations with animals not intended for human consumption, so the regulatory treatment cannot be the same.

	ANPROGAPOR	In the case of pigs, the option of wild boar should be included, as should the option of rabbits/hares. In NZT it should also be considered that they may have wild boar and therefore be subject to health control measures ensuring that they are not a source of infection for other Suidae. For pigs/wild boar the maximum capacity of a NZT should be up to 30 animals maximum	Finding accepted.
	Maxi Lange	The revision of the rigid limits is requested, incorporating qualitative criteria and allowing derogations for rescues and emergency situations.	These limits are established for animal health reasons, as it is estimated that there is a high health risk in the event of a concentration of animals above the limit.
	Animal Compassion Sanctuary Association Animal Protective Association Saving Bumped Animals	Proposal to amend Annex I It is proposed to include the following provision: <i>Zoological centres for the protection of animals or sanctuaries shall be exempt from the absolute maximum capacity limits laid down in this Annex.</i> <i>In such cases, the maximum capacity of animals shall be determined by technical criteria based on the acceptable stocking density in relation to the available area (livestock units per hectare), waste management capacity, animal welfare conditions and biosecurity measures in place, all of which shall be subject to an assessment by the competent authority.</i>	These limits are established for animal health reasons, as it is estimated that there is a high health risk in the event of a concentration of animals above the limit. There are no health reasons that would justify an exception for shelters.
	ARRECAL	The capacity of the zoo nucleus should be determined on the basis of the facilities, their characteristics and the care provided. This new limitation would run counter to the very spirit of the standard and the national hunting management strategy published by MAPA; even more so with the current ASF situation in Spain. In central and southern Spain, packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs contain several packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs of packs In addition, they breed for restocking and have juvenile specimens that form the 'quarry' of the pack. The 50 copies	This number is established for animal health reasons, as it is estimated that there is a high health risk due to the concentration of animals above the limit.

		are easily exceeded. Set a maximum limit in any case of not less than 100 dogs.	
Annex II Health tests to be carried out in the shelters at the entry of the animals	THE COMMUNITY OF MADRID	Drafting proposal: <i>Minimum health tests to be carried out in the shelters at the entry of the animals</i> We would like to add the following text to Annex II: <i>Health tests at the start of quarantine shall be carried out at origin, within 30 days prior to the entry of the animals, provided that they come from registered establishments and this is feasible.</i>	It is not appropriate to apply requirements for livestock production holdings to the NZT.
	Official Chamber of Veterinary Surgeons of Murcia	It is considered necessary to revise the list of diseases in Annex II, as there might be diseases relevant from a health point of view that are not included or whose periodicity of surveillance is not clearly defined. It is also considered advisable to expressly include monitoring of relevant zoonoses associated with species kept in traditional zoological centres. In this regard, it is proposed to strengthen coordination between animal health authorities and public health authorities to improve the detection and control of transmissible diseases between animals and humans.	If necessary, the Annex will be amended in the future.
	GENERAL COUNCIL OF VETERINARY COLLEGES	- It is considered necessary to revise the list of diseases in Annex II, as there might be diseases relevant from a health point of view that are not included or whose periodicity of surveillance is not clearly defined. It is also considered advisable to expressly include monitoring of relevant zoonoses associated with species kept in traditional zoological centres. — To this end, it is proposed to strengthen coordination between animal health authorities and public health authorities in order to improve the detection and control of transmissible diseases between animals and humans.	If necessary, the Annex will be amended in the future.
	ASELCRE	Annex II imposes on shelters an excessively detailed and disproportionate obligation to register treatments, requiring the inclusion in the health certificate of a very large volume of data	These are not disproportionate burdens, and records are required for the control function.

		which are, to a large extent, already included in the veterinary prescription or in the corresponding clinical documentation. This requirement is particularly onerous in zoological centres not intended for livestock production, to which a logic of control specific to holdings of productive animals should not be unequivocally transferred.	
	ANPROGAPOR	We understand that there is an error in the analytical tests for pigs/wild boar for entry into the animal shelters at the start of quarantine. Sampling should be included for all notifiable diseases in pigs: — PCR test for African horse sickness Serological test for ASF PCR test for Classical Porcine Peste Serological test for Classical Porcine Peste Serological test for brucellosis — Serological test Aujeszky disease of both gB and gE. — Foot and mouth disease PCR test — Serological test for foot-and-mouth disease	It is not appropriate to apply requirements for livestock production holdings to the NZT.
	Maxi Lange	It is requested to allow progressive health testing after admission, by means of quarantine protocols and individualised assessment.	There are no health reasons for this.
	CATALONIA. Directorate-General for Agriculture and Rural Development	In relation to ASF, we consider the appropriate test to be PCR.	Finding accepted.
Annex III Minimum content of the logbook	Barcelona Chamber of Veterinary Surgeons	It is proposed to amend paragraph 4 of Annex III: <i>1. Identification of the veterinary person of the NZT, if applicable: full name, NIF/NIE/Passport, membership number, as well as the responsible declaration of the holder and his/her termination, if any.</i>	Not accepted, it is an unnecessary administrative burden.
	Castile and Leon	It contains a higher number of requirements than RD 787/2023 in its Annex V (including the obligation to register a veterinarian therein and report of the veterinarian's report with the possible cause of death).	The data are considered to be the minimum in a basic standard. The provision of the email

		As already indicated depending on the classification or size, compliance with certain requirements could be waived. As regards email, as a minimum data, there may be owners of atypical holdings who are natural persons who are not obliged to interact electronically with the administration in accordance with Law 39/2015, so for this data it should be included where appropriate. In the case of official inspections and controls, if it is stated that the report must be appended, and the information cited is contained in the report, for example the identification of the veterinarian acting, an exception may be made to their entry in the register.	address is necessary for swift contact with the NZT holder, including for natural persons. Data not required from REGA holdings have been deleted.
	Balearic island	Annex III: structure the register book by classification The minimum registration should be adapted to the reality of each NZT classification to avoid unnecessary burden and facilitate official control. Drafting proposal (amendment of Art. 8.3 and Annex III) Article 8.3: “it shall contain at least the data listed in Annex III” Annex III shall be structured by categories of NZT or by homogeneous blocks, defining mandatory fields by type of establishment.	The data not required from REGA holdings have been deleted.
	Catalonia. Department of Territori, Habitatge I Ecological Transitions	Establish a simplified model for small censuses. Simplify the registration of treatments in wildlife recovery centres.	Not accepted, minimum data required. With regard to treatment data, these are provided for in line with those provided for in Royal Decree 666/2023. There is no reason to simplify them in wildlife recovery centres.
	AIZA	It is noted that paragraph 16 is introduced specifically in relation to traditional zoological centres housing animals for travelling exhibition, by expressly stating that ‘NNZZTs housing animals for travelling exhibition shall record movement data’. In the light of this wording, it is understood that the obligations contained in that paragraph, including point (d), would not apply to zoos and aquariums, insofar as they do not engage in travelling exhibition activities, but operate in permanent facilities.	It should not be stressed that data relating to travelling movements do not apply to zoos or aquariums if they do not, it is unnecessary. With regard to processing data, these are provided for in line with those provided for in Royal

		However, the absence of an express mention to that effect may give rise to interpretative doubts, in particular in relation to point (d), which imposes an exhaustive level of detail with regard to veterinary treatments, including individualised information on prescriptions, medicinal products, dosage, duration of treatment, identification of the animals and details of the prescribing veterinarian and the supplier. In the case of zoos and aquariums, this regime poses significant practical implementation difficulties, as: — complex zoological collections are hosted, with a high number of animals belonging to multiple species, many of them managed in groups or populations. health management is organised through continuous veterinary programmes, which include preventive measures, collective treatments and species-specific protocols. — zoos and aquariums have advanced clinical and pharmacological registration systems, often computerised and aligned with international standards (such as ZIMS/Species360), which already ensure the traceability of treatments, the identification of treated animals or groups and the involvement of qualified veterinary staff. In this context, a broad interpretation of point (d) could imply: disproportionate administrative burden, duplication of information already recorded in existing systems, and the need to adapt those systems to formats not designed for such establishments. It should also be borne in mind that the Annex itself provides for the possibility of not duplicating information when it is contained in veterinary prescriptions, which shows the desire to avoid duplication of data recording. In view of the above, we consider it necessary to: — expressly confirm that the obligations laid down in paragraph 16, and in particular point (d) thereof, do not apply to zoos and aquariums, or, failing that, expressly recognise the validity of the health registration and treatment systems already in place in these establishments, provided that they contain equivalent information and guarantee traceability and veterinary control. It is also considered appropriate to extend this criterion to all the requirements of Annex III, so as to enable zoos and aquariums	Decree 666/2023. There is no reason to simplify them in these NZTs.
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		to comply with the registration obligations by means of existing computerised systems and to avoid the imposition of rigid formats that could create duplication or unnecessary administrative burdens. All this in order to ensure a proportionate application of the rule, adapted to the operational reality, and compatible with the health management systems already established in the zoo sector.	
	ROYAL SPANISH HUNTING FEDERATION	Add a new point 18 as follows: <i>'It is not necessary to complete the entries and exits of animals during movements with return (movements to hunting grounds, sports grounds, training grounds or similar).'</i> The aim is to ensure that regulation is proportionate, operational and adapted to the reality of hunting activities, avoiding unnecessary administrative burdens that do not bring added value from a health or control point of view.	Not accepted, the return data is necessary for the traceability of movements.
	GENERAL COUNCIL OF VETERINARY COLLEGES	"It is proposed to amend paragraph 4 of Annex III: <i>1. Identification of the veterinary person of the NZT: full name, NIF/NIE/Passport, membership number, as well as the responsible declaration of the holder and his/her termination, if any.</i>"	Not accepted, adding unnecessary administrative burden.
Annex IV Minimum content of training courses	ROYAL SPANISH HUNTING FEDERATION	— Firstly, it should be noted that the training content provided for in Annex IV corresponds to a standard model which does not correspond to the reality of certain traditional zoological centres linked to hunting activities, in particular packs of hunting hounds or groups of hunting dogs, where management is usually carried out by the holder and there is no employment structure or rotation of staff. In that regard, the imposition of a uniform and general training content may prove disproportionate and inappropriate, since it does not take into account the particularities of those activities or the practical experience gained by their holders. —It is considered essential that the required training be modulated according to the species in the zoo nucleus, avoiding the imposition of general training content that is not applicable to the	It is a minimum training content for the proper handling of animal health and welfare of NZT animals, with a duration of only 20 hs. Any modulation will correspond to the regulatory development by the Autonomous Communities.

		specific reality of each facility. It is unreasonable to require the same training content from a nucleus exclusively keeping hunting dogs as from a nucleus containing different species with different health or handling needs.	
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