



### BVA, BVA Welsh Branch, AGV, BEVA, BVPA, GVS, PVS, SVS, VDS and VPHA response to the Defra and Welsh Government consultation on improvements to animal welfare in transport.

- 1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) We have developed our response in consultation with BVA Welsh Branch and our species and sector-specific divisions, including:
  - The **Association of Government Veterinarians (AGV)** is a specialist division of BVA representing the views of veterinarians working in UK Government Departments and Executive, Agencies or principally engaged in the delivery of services for any UK Government Department or their Executive Agencies.
  - The **British Equine Veterinary Association (BEVA)** serves and leads the equine veterinary profession in the championing of high standards of equine health and welfare and the promotion of scientific excellence and education. BEVA represents some 3,750 members.
  - The **British Veterinary Poultry Association (BVPA)** is an active non-territorial division of the British Veterinary Association. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.
  - The **Goat Veterinary Society (GVS)** is a division of BVA and has approximately 300 members, including veterinary surgeons with a specific interest in goat health and welfare, but also has a significant “non-veterinary” membership including owners and farm personnel from across the entire spectrum of goat keeping in the UK.
  - The **Pig Veterinary Society (PVS)** is a specialist division of the British Veterinary Association. The membership of PVS includes veterinary surgeons and scientists who work in the pig sector, and the Society aims to assist its members in their professional lives by ensuring they have access to the latest information with regards pig health and production. PVS also represents the membership at a national level, making sure that pig welfare is a priority considering the latest research with regards health and management on farm.

- The **Sheep Veterinary Society (SVS)** promotes sheep health and welfare as a specialist division of the BVA. While most of its 700 members are vets, many are drawn from all sectors of the sheep industry.
  - The **Veterinary Deer Society (VDS)** was established in 1981 with the object of aiding those vets interested in deer to exchange information more easily. While the original impetus for the Society came from the growing deer farming industry, many members are more involved with park and wild deer, zoological collections, and involved in research into diseases of deer.
  - The **Veterinary Public Health Association (VPHA)** is a division of BVA and is committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.
- 3) We welcome the opportunity to respond to this consultation on proposals to improve the welfare of animals during transport. We support Defra and Welsh Government's stated policy objectives to end excessively long journeys for slaughter and fattening, ensure slaughter as close to the point of production as possible, and to improve animal welfare during transport more generally for both short and long journeys.
  - 4) However, we have concerns as to whether this proposal will effectively deliver these desired outcomes while supporting animal welfare on-farm, before, during and after transport, and at slaughter in the UK. Consequently, we do not support the proposed ban on live exports for slaughter and fattening as we are concerned that this proposal oversimplifies the wider determinants of animal welfare during transport. It is important to emphasise that with regard to this specific proposal, AGV support the proposed ban on live exports, with emphasis being put on work to mitigate the risks to welfare that could emerge as a consequence.
  - 5) If a ban on live exports for slaughter and fattening is progressed by government it is paramount that it is accompanied by consideration of, and mitigation for, any unintended adverse welfare consequences. Efforts should also be made to work with industry to find practical alternatives to live export for slaughter and fattening.
  - 6) While we are broadly supportive of Government's evidence-based proposals to improve general welfare during transport in the England and Wales, further consideration is required as to how these would be applied in practice. In addition, we are concerned that these proposals disproportionately focus on journey length, despite evidence suggesting that transport conditions and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.<sup>1,2,3,4</sup> We consider that this consultation is a missed opportunity to holistically explore improvements to the wider determinants of welfare during transport. See section on 'General improvements to welfare during transport' for further detail.
  - 7) It is important to emphasise that any legislative improvements are only beneficial if they are effectively enforced. The 2019 FAWC opinion on the welfare of animals during transport identified that lack of consistent enforcement and policing was one of the key barriers to the successful implementation of the existing animal transport regulations to safeguard welfare. Consideration should be given to how the enforcement of welfare in transport regulations could

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<sup>1</sup> Cockram, M.S., 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science*, 106(4), pp.234-243.

<sup>2</sup> Warriss, PD., Brown, SN., Knowles, TG., Kestin, SC., Edwards, JE., Dolan, SK., Phillips, AJ., 1995. Effects on cattle of transport by road for up to fifteen hours. *Veterinary Record*, 136, 319-323.

<sup>3</sup> Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

<sup>4</sup> Nielsen, B.L., Dybkjær, L. and Herskin, M.S., 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal*, 5(3), pp.415-427.

be better aligned between local authorities and APHA to ensure improved collaboration and consistent safeguarding of animal welfare. Government should also ensure that APHA and local authorities have sufficient resource to monitor the implementation of new proposals, and investigate any resulting non-compliances, by ring fencing funding for the effective enforcement of any new proposals.

8) BVA has developed [a full position on the welfare of livestock during transport with specific principles and recommendations to inform improvements to legislation](#), in summary:

- Any movement of animals will have a potential impact on their health and welfare. Whatever the type and scale of movement, the welfare of animals must be prioritised with the aim of reducing the impact of the movement as far as is reasonably possible.
- In order to achieve this, all those involved with moving animals must understand what is required of them in law, receive certified training and be encouraged to follow sector-specific good practice guidelines
- Wherever possible, and paying due regard to scientific evidence regarding the relationship between journey times and welfare outcomes, animals to be slaughtered for food should be slaughtered as close to the point of production as possible.<sup>5678</sup> No animal should be knowingly exported to a destination with unknown welfare standards or exported then raised in systems banned in this country due to welfare considerations. Neither should animal product from such animals be re-imported.
- BVA supports existing legal requirements ( eg those derived from European Community Regulation 1/2005 and set out in the UK Welfare of Animals (Transport) Orders<sup>910</sup> and Regulations<sup>1112</sup>) that are in force to protect the health and welfare of livestock during transport.<sup>13</sup> It is essential that there are a well-defined set of animal health welfare standards that must be met for the **entirety** of the journey of animals being transported in this country and abroad. These minimum standards should be the same for all animals no matter the purpose of the export (for example if it is for breeding or fattening), in line with current legislation.
- BVA welcomes legislative improvements to safeguard the welfare of animals during transport. Any improvements should be evidence-based and informed by a welfare outcomes approach. However, it is important to emphasise, that any legislative improvements are only beneficial if they are effectively enforced.
- Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended

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<sup>5</sup> Defra: Transcontinental road transport of breeder pigs - effects of hot climates

<sup>6</sup> Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

<sup>7</sup> Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

<sup>8</sup> Mitchell, M.A. & Kettlewell, P.J.(2008) Engineering and design of vehicles for long distance road transport of livestock (ruminants, pigs and poultry). *Veterinaria Italiana*, 44 (1), 197:209

<sup>9</sup> [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

<sup>10</sup> [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

<sup>11</sup> [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

<sup>12</sup> [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

<sup>13</sup> As set out in [Welfare of Animals During Transport: Guidance on implementation in the United Kingdom](#):

*The EU Regulation does not apply to the transport of animals when this is not in connection with an economic activity or to the transport of non-vertebrate animals. Non-vertebrates are animals such as insects, worms, crustaceans (e.g. crab, lobster), cephalopods (e.g. octopus, squid) and molluscs (e.g. shellfish, snails). However, a general duty of care provision protecting non-vertebrates and animals involved in non-commercial movements from injury or unnecessary suffering is included in domestic legislation (Article 4 of WATEO 2006 and parallel legislation in Scotland, Wales and Northern Ireland). **Anyone transporting animals must ensure that they are transported in conditions suitable for the species concerned.***

consequences on animal welfare and industry across the UK.

## Live animal exports

### Q1: Do you agree that livestock and horse export journeys for slaughter and fattening are unnecessary?

- 9) We do not support the proposed ban on live exports for slaughter and fattening as we are concerned that this proposal oversimplifies the wider determinants of animal welfare during transport. We consider that there are occasions where it is necessary to export livestock for slaughter and fattening. See below section on 'Examples where live export and longer journeys may be necessary.'
- 10) We support the principle that all animals should be slaughtered as close to the point of production as possible, and recognise that, as outlined in the 2019 FAWC opinion on the welfare of animals during transport, in some cases animals are being transported past UK abattoirs to be slaughtered overseas.<sup>14</sup>
- 11) No animal should be exported and then raised in systems previously banned in this country or exported for non-stun slaughter due to welfare considerations. Animals should not be exported into systems that have standards below the UK minimum or exported and then raised in systems previously banned in this country. Further, animals should not be exported for non-stun slaughter.
- 12) However, we are concerned that this consultation question oversimplifies the full picture of animal welfare during transport. Welfare conditions during transport should not be considered in isolation, and there should not be a disproportionate emphasis on journey duration. It is paramount that Government takes a holistic approach when considering animal health and welfare conditions at transport, including the wider determinants of welfare before, during and after transport, whether that be for slaughter, fattening or breeding.
- 13) Therefore, if a ban on live exports for slaughter and fattening is progressed, it must be accompanied by consideration of, and mitigation for, any unintended adverse welfare consequences. In addition, if Defra and Welsh Government are to progress this proposals, careful consideration must be given to the timescale of implementation and the potential impact on breeding decisions for those species specifically bred for export.

### Examples of where live export and longer journeys may be necessary

#### 14) Dairy bull calves

At present, as an alternative to slaughter shortly after birth, bull calves can be raised for production of veal (up to 8 months of age) or young beef/rosé veal (around 8-12 months of age). Significant steps have been made by the dairy sector to promote the uptake of dairy bull calves being retained in the British beef chain, which have had a substantial impact. The number of calves rose 59% from 245,586 calves in 2006 to 392,473 in 2015, with an estimated 81% of all male calves born to in the Great British dairy herd in 2015 being reared for beef in Great Britain.<sup>15</sup>

- 15) However, the market for veal in the UK remains volatile, with a relatively small number of abattoirs accepting dairy bull calves for slaughter. This results in some producers exporting dairy bull calves outside of the UK where there is a market for veal to replace the need for killing soon after birth. There have been significant efforts to reduce the number of calves exported from the UK, with a 98% reduction between 2006 and 2014, from 80,700 to less than 2000 calves. This represented just

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<sup>14</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at:

<https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

<sup>15</sup> AHDB 2018/BCMS, referenced in <http://beefandlamb.ahdb.org.uk/wp-content/uploads/2018/03/CHAWGupdate-on-Dairy-bull-calves-March-2018.pdf>

0.5% of dairy calves born in 2014.<sup>16</sup> This decrease is largely due to improved opportunities in the UK for rearing high-welfare veal and beef and the closure of overseas markets.

- 16) Consideration should therefore be given to the fact that banning live export for slaughter and fattening could result in increased killing of unwanted dairy bull calves, who without a viable market in the UK, may be killed at a young age, shortly after birth. Given the relatively small numbers of abattoirs that accept dairy bull calves and the small UK market for veal, it is likely that these animals would be killed on-farm soon after birth, with an appropriate firearm, or by chemical injection by a veterinary surgeon. This would run directly contrary to AHDB's stated aspiration to support Britain's farmers to move away from euthanasia of dairy bred bull calves by 2023 as set out in the [AHDB GB Dairy Calf Strategy 2020-2023](#).
- 17) Provided killing is carried out humanely, this does not present welfare harm to dairy bull calves per se. However, it can be contentious amongst the wider public to kill healthy young animals, raising ethical issues surrounding the denial of potentially positive experiences that could have been available to the young animal. It may also pose risks to animal welfare depending on the method of killing and the treatment of the animal before it is killed. Without a specific intended use of the carcass, the routine killing of healthy animals also constitutes wastage, which is not in line with the principle of sustainable animal agriculture. For an animal agriculture system to be regarded as sustainable, it should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need.
- 18) In this context, where the export of dairy bull calves is undertaken in compliance with current legislative requirements to safeguard welfare in transport, and into systems with equivalent welfare standards to the UK, this can present an ethically justifiable and sustainable alternative to killing dairy bull calves shortly after birth.
- 19) [Read our full position on surplus male animals](#), which advocates that the dairy and egg industries should adopt a '3 Rs' approach, to first minimise the number of surplus males being produced (reduce), then avoid the need to kill them by finding suitable markets (replace) and improve slaughter methods to minimise suffering and improve welfare (refine).
- 20) Horses  
Anecdotal evidence suggests that where the export of horses does occur, this occurs under the radar and outwith legislative frameworks eg. horses that are exported under the guise that they are riding ponies. Therefore, the proposed ban is likely to have limited impact on these horses as these movements are likely to continue in this manner.
- 21) Ensuring suitable abattoir facilities  
It is important to recognise that where there are no or limited abattoir facilities suitable for maintaining the welfare of livestock at slaughter available in the UK, export overseas for slaughter, and longer journeys within the UK itself, may be necessary to ensure that the welfare of animals is maintained at slaughter with the provision of appropriate abattoir facilities and species-specific operator expertise.
- 22) For example, FAWC noted that within the UK itself, high numbers of cull sows are exported to across the sea from Northern Ireland to Great Britain due to a lack of suitable abattoir facilities in Northern Ireland.<sup>17</sup>
- 23) In addition, at the time of writing, there are only four abattoirs approved to slaughter horses in Great Britain, and only two that regularly slaughter horses. Consequently, some horses may have to travel

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<sup>16</sup> Ibid.

<sup>17</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

long distances to slaughter within the UK itself. These journeys may involve longer journey times than live exports for slaughter overseas. However, where horses are slaughtered at a slaughterhouse, it is essential that their species-specific needs and temperament are considered in both handling operations and facility design. Horses can be distressed by the presence of other species in the slaughterhouse. As with other livestock species, they require calm and considerate handling, as well as species-specific facilities.

**Question 2: Do you agree that in order to prohibit livestock and horse export journeys for fattening where the animal will be slaughtered soon after arrival, these export journeys where animals are slaughtered within 6 months of arrival should be prohibited?**

24) While we support Government's overall policy objectives to end excessively long journeys for slaughter and fattening and ensure slaughter as close to the point of production as possible, we are concerned that the proposal to ban live exports for slaughter and fattening is not an effective mechanism to deliver these outcomes.

25) Further details required on enforcement

Further detail is required as to how this proposal would be effectively enforced to ensure that there are no legislative loopholes. For example:

- What evidence would be required to prove that the consignment is being exported for breeding purposes and not slaughter or fattening?
- How would enforcement authorities verify that animals are being exported for their intended purpose once they have left England and Wales?
- How would enforcement authorities verify that a consignment has not been slaughtered within the 6-month time frame once it has left the UK?
- What happens to animals that are exported for breeding and are subsequently identified as unsuitable or develop an injury or illness that requires them to be culled and would be fit for slaughter for human consumption?

26) In this context, we are also concerned that if vets were expected to certify that animals were being exported for breeding or longer production, this proposal would put unrealistic demands on the certifying vet. As highlighted in the [RCVS 10 principles of certification](#):

*A veterinarian should certify only those matters which:*

- a) are within his or her own knowledge;*
- b) can be ascertained by him or her personally;*
- c) are the subject of supporting evidence from an authorised veterinarian who has personal knowledge of the matters in question; or*
- d) are the subject of checks carried out by an Officially Authorised Person (OAP)*

27) Effective enforcement of these proposals is particularly pertinent given that the 2019 FAWC opinion on the welfare of animals during transport identified that lack of consistent enforcement and policing was one of the key barriers to the successful implementation of the existing animal transport regulations to safeguard welfare.<sup>18</sup> Consideration should be given to how the enforcement of welfare in transport regulations could be better aligned between local authorities and APHA to ensure improved collaboration and consistent safeguarding of animal welfare.

28) Impact on movements in other parts of the UK

Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.

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<sup>18</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

29) While we recognise that these proposals will not impact domestic movements of livestock within the UK, we are concerned that if a unified UK-wide approach is not agreed upon, banning exports for slaughter and fattening that leave from, or pass through, England and Wales could result in unintended consequences for the welfare of livestock exported from Scotland and Northern Ireland.

30) The 2019 FAWC opinion highlighted that recent evidence showing that the motion at sea can cause increased stress in sheep and pigs, and that due to a lack of research it is not yet possible to determine maximum acceptable journey duration by sea.<sup>19</sup> We are therefore concerned that if live export for slaughter and fattening is permitted to continue from Scotland and Northern Ireland, this may result in longer sea journeys for livestock with no evidence-based welfare safeguards for journey duration, as transporters will not be able to pass through England and Wales via road.

31) Assessment of UK abattoir provision and capacity

It is also not clear whether Government has conducted a UK-wide assessment of abattoir provision and capacity to ensure there are no adverse impacts in the UK on the welfare of animals during transport, at slaughter, or on-farm were there to be barriers to accessing slaughter facilities in a timely fashion. The 2019 FAWC opinion on the welfare of animals during transport echoes this concern with the following recommendation:

*“FAWC recommends that there is a review of the availability of abattoirs related to the points of production and particularly mindful of end of life requirement. This will identify where abattoirs need to be sited in order to meet the needs of farmers and to minimise journey times and thereby meet the welfare needs of animals.”<sup>20</sup>*

32) It is important to recognise that the total number of abattoirs in the UK has declined.<sup>21</sup> The [2020 APGAW report into the Future for Small Abattoirs in the UK](#) examined data on throughput in this context and found that while the number of total abattoirs in the UK has reduced, throughput has remained largely the same. This reflects the rationalisation of the slaughter industry and a shift towards a centralised processing model, where larger abattoirs serve specific retailers, producers or quality assurance schemes. In addition, anecdotally we have heard that improved legislative standards, and those from retailers and assurance bodies, including for welfare, have required slaughter premises to replace or update their equipment in order to comply with these standards. This has led to some smaller premises closing due to financial pressures.

33) A shift towards this model of abattoir provision can increase journey lengths to slaughter as the number of abattoirs diminishes. Where current legal requirements derived from European Community Regulation 1/2005 and set out in the UK Welfare of Animals (Transport) Orders<sup>2223</sup> and Regulations<sup>2425</sup> are effectively applied and enforced, this in itself is not a welfare concern as evidence suggests transport conditions and fitness to travel are of greater importance than journey duration (time and

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<sup>19</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

<sup>20</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

<sup>21</sup> Sustainable Food Trust, 2018. A Good Life and a Good Death: Re-localising farm animal slaughter. Available at: <https://sustainablefoodtrust.org/articles/a-good-life-and-a-good-death-re-localising-farm-animal-slaughter/>

<sup>22</sup> [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

<sup>23</sup> [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

<sup>24</sup> [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

<sup>25</sup> [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

distance) in terms of safeguarding the health and welfare of animals during transport.<sup>26,27,28,29</sup>

- 34)** In addition, larger, high-throughput abattoirs may present health and welfare advantages throughout the slaughter process. These advantages may include more defined roles and responsibilities for staff, standardisation of processes, up-to-date staff training, internal and external audit to meet retailer and quality assurance scheme requirements, suitable handling facilities, and additional resources to invest in new equipment and ongoing maintenance.
- 35)** We also recognise that mobile abattoirs can provide opportunities to slaughter animals as close to the point of production as possible, in turn reducing the need for animals to be transported over longer distances.<sup>30</sup> We are therefore supportive of exploring options to provide more opportunities for farm animal slaughter as close to the point of production as possible. We note the Scottish Government has recently commissioned a study to determine whether or not mobile abattoirs would be viable in Scotland.<sup>31</sup>
- 36)** Mobile abattoirs must comply with current legislative requirements for animal health and welfare at slaughter, biosecurity and waste disposal, food safety and hygiene checks, including ante- and post-mortem inspections performed by OV's. In addition, it is important there are safe lairage facilities, a potable supply of water, facilities for the disposal of animal by-products, as well as suitable facilities for the chilling, dressing and movement of carcasses.
- 37)** However, any growth in mobile abattoirs to meet a potential increased demand for slaughter facilities should not represent a downgrading of animal health and welfare or public health standards. We can only support the use of mobile abattoirs where there is full compliance with current legislative requirements for processing and certification, and appropriate supervision from OV's.
- 38) Additional policy mechanisms to safeguard welfare**  
Given the above concerns, we do not support the proposal to ban live exports for slaughter and fattening. If the proposed ban on live exports for slaughter and fattening is progressed by government, it must be accompanied by consideration of, and mitigation for, any unintended adverse welfare consequences. Efforts should also be made to work with industry to find practical alternatives to live export for slaughter and fattening.

**Q3: Do you agree that the only exceptions to prohibiting live export journeys should be for poultry live exports, and animals going for breeding or production that will not be slaughtered within 6 months of arrival? Please explain your views.**

- 39)** We do not support the proposal to prohibit live exports for slaughter and fattening, due to the potential negative impacts on wider welfare as outlined above. However, if the government are to progress this proposal, we agree that animals exported for breeding or production should be exempt from the ban.
- 40)** We agree that poultry live exports for slaughter, further production and breeding should be exempted from these proposals. It is important to recognise that the UK is a centre of excellence in respect of poultry genetics and pedigree stock, ensuring the provision of genetics to feed the world – valuable

<sup>26</sup> Cockram, M.S., 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science*, 106(4), pp.234-243.

<sup>27</sup> Warriss, P.D., Brown, S.N., Knowles, T.G., Kestin, S.C., Edwards, J.E., Dolan, S.K., Phillips, A.J., 1995. Effects on cattle of transport by road for up to fifteen hours. *Veterinary Record*, 136, 319-323.

<sup>28</sup> Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

<sup>29</sup> Nielsen, B.L., Dybkjær, L. and Herskin, M.S., 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal*, 5(3), pp.415-427.

<sup>30</sup> Sustainable Food Trust, 2018. A Good Life and a Good Death: Re-localising farm animal slaughter. Available at: <https://sustainablefoodtrust.org/articles/a-good-life-and-a-good-death-re-localising-farm-animal-slaughter/>

<sup>31</sup> Scottish Government, 2019. CR/2018/40 - Assessing the viability and sustainability of mobile abattoirs in Scotland. Available at: [https://www.publiccontractsscotland.gov.uk/search/show/search\\_view.aspx?ID=JAN341993](https://www.publiccontractsscotland.gov.uk/search/show/search_view.aspx?ID=JAN341993)

both in terms of production and in terms of human and animal health. Broiler chickens also tend to be slaughtered at 38-42 days so would not be able to meet the proposed 6-month requirement.

- 41) In addition, in the poultry sector live chicks are exported, then reared and slaughtered in other countries. Whilst it paramount that high welfare destination conditions are ensured for these chicks, it is also important to recognise that the exporting of these chicks is an important practice to ensure that countries can trade excess and deficit stock numbers to manage oversupply and ultimately avoid the destruction of chicks from breeding lines that have no market in this country.
- 42) Further, day-old chicks are able to survive on their yolk sac reserves to support them during the first 72 hours of life.<sup>32</sup> Therefore, they may be more amenable to transport with the provision of appropriate environmental controls as opposed to adult animals where transport can be a more significant risk to stress, health and welfare. This is in line with conclusions from the SRUC systematic review which highlighted that journeys of up to 24 hours may be still be appropriate for day-old chicks, due to energy and water reserves in the yolk sack.<sup>33</sup> However, it is remains important to recognise that the [Defra Code of practice for the welfare of laying hens and pullets](#), outlines that:

*“Chicks start to peck and learn about appropriate food and pecking substrates during the first 24 hours of life. Consideration should be given to providing chicks with both food substrate and water (for example, through the provision of a gel block) as soon as possible after hatching; chicks should not be expected to rely on the egg yolk sac remnants as the sole source of nutrition.”*

### General improvements to welfare during transport

- 43) We are broadly supportive of Defra and Welsh Government’s efforts to make evidence-based improvements to current legislative requirements to safeguard the welfare of animals during transport, both for short and long journeys.
- 44) Data from the FSA can be used to track animal welfare non-compliances during transport for slaughter, and currently provides a baseline for improving welfare during transport for these specific journeys (to slaughterhouses in England and Wales).<sup>34</sup>
- 45) In our positions on [the welfare of livestock during transport](#) and [the welfare of animals at slaughter](#), we set out key principles and recommendations that should inform any legislative changes to animal transport regulations to improve welfare:
- To improve welfare outcomes before, during and after transport, the implementation of current legal requirements should be improved to ensure that requirements relating to appropriate transport conditions and fitness to travel of animals are adequately enforced.
  - Any legislative improvements to safeguard the welfare of animals during transport must be evidence-based and informed by a welfare outcomes approach.
  - Any proposals to improve welfare during transport should consider all forms of transport and address the issue of welfare before, during and after journeys.
  - Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.
  - The welfare of ‘registered’ horses who are not ‘high performance’ horses, and therefore may not be afforded an adequate level of care, should be protected.

<sup>32</sup> Chamblee, T. N., Brake, J. D., Schultz, C. D., & Thaxton, J. P. (1992). Yolk sac absorption and initiation of growth in broilers. *Poultry science*, 71(11), 1811–1816. <https://doi.org/10.3382/ps.0711811>

<sup>33</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

<sup>34</sup> See Annex 2 ‘Data stories: Analysis of welfare trends for major and critical non-compliances in England and Wales’, FSA Board Papers 5 September 2018.. Available at: <https://www.food.gov.uk/sites/default/files/media/document/final-annex-2-data-stories-290818-updated-figs-5-and-7.pdf>

- When considering legislative improvements to safeguard the welfare of animals during transport, consideration should be given as to how to address all determinants of potential welfare compromise. These may be complex and potentially conflicting.
- Consideration should be given to the complex species-specific requirements for transport design, vehicle condition and hygiene, as well as stocking density to achieve optimal health and welfare outcomes. We strongly support the implementation of recommendations regarding improvements to the quality of transport vehicles as set out in the [2011 EFSA Scientific Opinion concerning the welfare of animals during transport](#).
- All drivers and farmers intending to transport livestock in connection with an economic activity must receive certified training (as is already required of hauliers), with sound knowledge of how aspects of driving can directly impact on the welfare of animals being transported. This may be linked to a future system of public money for public goods.
- Attendants at rest points should have similar responsibility for the animals under their care as hauliers and should have received appropriate certified training in animal handling.
- Appropriate veterinary care must be available at rest points in order to recognise and assess any potential welfare issues, manage any negative welfare outcomes and ensure the provision of emergency slaughter if needed.
- All drivers and farmers intending to transport livestock in connection with an economic activity must receive certified training on the factors that make an animal fit or unfit for transport. This may be linked to a future system of public money for public goods.
- The welfare of animals pre-, during and post-transportation should be monitored under the direction of a veterinary surgeon in order to manage any potential negative welfare outcomes. Further consideration should be given to implementing outcomes-based approaches to measure animal welfare before, during and after transport eg. sensors to measure temperature, exact timings and animal welfare indicators.
- To complement and promote the continuous improvement of skilled animal handling, we would welcome increased use of technology during handling operations to provide more opportunities to verify and observe handling practices. For example, CCTV on lorries for loading/unloading or body cameras on animal handlers.
- There is also an opportunity to better use the information contained in abattoir reports (Food Chain Information (FCI) and Collection and Communication of Inspection Results (CCIR) data) as a meaningful source of information that could improve animal health and welfare, both on-farm and during preparation for slaughter and transport. If data from the FCI and CCIR were fed back to the farm veterinary practice and transporter, as well as the producer, it could be used to inform future herd and flock health planning, at the holding of provenance, as well as journey planning for producers and transporters.

46) However, it is important to emphasise, that any legislative improvements are only beneficial if they are effectively enforced. The 2019 FAWC opinion on the welfare of animals during transport identified that lack of consistent enforcement and policing was one of the key barriers to the successful implementation of the existing animal transport regulations to safeguard welfare. Government should ensure that APHA and local authorities have sufficient resource to monitor the implementation of new proposals, and investigate any resulting non-compliances, by ring fencing funding for the effective enforcement of any new proposals.

### Maximum journey times

**Q6: Do you agree with the proposed maximum journey times as outlined in Table 1? Please explain your views and highlight any potential regional impacts that your business or organisation might experience.**

47) We broadly agree with the desirable maximum journey times set out in the FAWC opinion on welfare during transport. These are proposals based on the best available evidence, which was identified as part of the SRUC and University of Edinburgh systematic review. However, we note that the definition of what is meant by “journey time” in the systematic review is not clear, and further clarity is required as to whether it refers to time spent moving, or whether it includes loading and unloading time as per current legislation and proposals.

- 48) It is also important to recognise that evidence suggests transport conditions (eg. driver competence and vehicle design) and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.<sup>35,36,37,38</sup>
- 49) FAWC acknowledges its recommendations for maximum journey times are made based on the best available evidence, and that further research is required to address species-specific and subgroup-specific knowledge gaps to determine appropriate maximum journey times, temperature ranges and optimum rest periods. Government should commission this research to further enable evidence-based refinement of these proposals in the future.
- 50) Concerns around proposed maximum journey time for broilers  
We note that the Government's proposed reduction in maximum journey time for broilers to 4 hours (including loading and unloading) would result in a very short window for moving poultry from farm to the abattoir. Anecdotally, our members have reported that the process of catching birds, loading crates and modules, and unloading at the abattoir can take up to two hours. It is crucial that catching, loading and unloading is not rushed to prevent any adverse impacts on welfare.
- 51) In addition, on occasions abattoirs facilities also breakdown and birds may be required to be transported in excess of four hours to reach the nearest available slaughter facility. If they were unable to be transported this extra distance and had to be returned to farm this could result in additional welfare issues when unloading and may result in overstocking given the proposed 48 hour rest time between journeys.
- 52) We are also concerned that this proposal would limit the area around an abattoir from which the plant can source birds. From a food supply chain perspective, it is desirable to avoid clusters of supply farms all very close to an abattoir, as in the event of a disease outbreak, for example current cases of Avian Influenza, the food chain would be severely disrupted.
- 53) Registered horses  
In addition, under current regulations 'registered' horses and ponies are also exempt from certain aspects of welfare regulations for journeys of more than eight hours as they are deemed 'high performance' and their conditions of transport (as valuable animals) are assumed to be above the minimum standard. However, all horses have the potential to become low value even if they are registered, (for example through injury or retirement), and so they may experience lower standards of welfare once their value is lessened as the derogation from certain welfare provisions will still apply.
- 54) Impact on time in markets  
There also needs to be very clear guidance as to how time in markets affects official journey times. The impact on welfare of animals at markets can be considerable and will depend greatly on what opportunities there are for livestock to rest, eat and drink, as well as impact of loading and unloading. If there are no opportunities to rest or access water at the market, the time in the market should be considered as part of the journey time.
- 55) Importance of enforcement

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<sup>35</sup> Cockram, M.S., 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science*, 106(4), pp.234-243.

<sup>36</sup> Warriss, PD., Brown, SN., Knowles, TG., Kestin, SC., Edwards, JE., Dolan, SK., Phillips, AJ., 1995. Effects on cattle of transport by road for up to fifteen hours. *Veterinary Record*, 136, 319-323.

<sup>37</sup> Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

<sup>38</sup> Nielsen, B.L., Dybkjær, L. and Herskin, M.S., 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal*, 5(3), pp.415-427.

Enforcement and regulatory oversight of these maximum journey times must also be considered as longer journey times will largely apply to those journeys that either start or finish outside of the UK. It is therefore not clear as to what regulatory controls would be in place to identify non-compliances and what enforcement action could be taken. Consideration should also be given as to how these proposals may disproportionately affect those moving livestock and horses to shows, competitions, leisure events and exhibitions.

#### 56) Wider determinants of welfare

For these reasons it is paramount that proposals to establish maximum journey times are considered in conjunction with measures to improve wider welfare at transport and ensure effective enforcement of future regulations. This includes vehicle design (as addressed later in the consultation proposals), as well as improved training to ensure driver/haulier/keeper competence and ability to identify animals that are fit for transport, and ensuring all horses receive adequate welfare protections in regulation. With this in mind, Defra and Welsh Government should also implement the following recommendations, as set out in the FAWC opinion on the welfare of animals during transport<sup>39</sup>:

- *FAWC recommends that guidance such as the [EU “Animal Transport Guides”](#) should be applied and promoted by the industry and government. These best practices guides have been researched and designed to improve the welfare of animals during transport and have so far been provided for: cattle, sheep, pigs, poultry and horses. Other guides exist for: goats<sup>26</sup>, dogs, cats and fish.*
- *FAWC recommends that a more specific definition of fitness to transport should be created, and the industry/levy boards could act to promote improved dialog and understanding regarding criteria fitness for transport and suitable transport conditions. Tools such as videos, posters, leaflets and written guides could all be used using the information based on best practice guides.*
- *More training should be provided to enable owners/ farmers/ transporters to identify animals that are not fit for transport. This recommendation should apply to all livestock, poultry and equine animals.*
- *FAWC recommend that horses should not be classified as either registered or unregistered in any proposed Regulation. Instead, the terms registered or unregistered should be removed altogether from transport legislation and that all horses should be reclassified solely as “horse(s)”. This would ensure that all horses are covered under the same Regulation and that the highest welfare standards are applied.*
- *FAWC recommends that all vehicles that are used to physically transport livestock, poultry and horses (i.e. lorries, trailers, horse boxes) should be inspected by Vehicle Approval Bodies, regardless of journey length. It is anticipated that these requirements will be rolled over several years due to the number of vehicles that are used for transporting these animals. All vehicles that are used to transport animals will be issued with a certificate. Whereas, vehicles which transport other vehicles containing animals i.e. trains or ships should follow similar guidance laid out by the International Air Transport Association (IATA) Live Animals Regulations<sup>32</sup>.*
- *FAWC recommends that accelerometers should be retro-fitted to all vehicles that are used to transport livestock, poultry and horses and acceleration, braking, cornering and uneven road surfaces should be recorded by these devices. The recordings of these devices, should be submitted to the LA or APHA on request; for example, if there are increased levels of lameness, bruising or dead on arrival animals noted at the slaughterhouse.*
- *FAWC recommends that a circular approach to all journeys where feedback is provided on all long or exported journeys between the transporters and APHA. Currently, a lack of resources may mean that this is not routinely carried out. Complete feedback is required to identify reoccurring issues identified on journeys, and appropriate enforcement is applied if necessary.*
- *FAWC recommends that the enforcement between LAs and APHA should be better aligned and with improved collaboration so that transport and animal welfare remain a priority. This will*

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<sup>39</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

*require stronger liaison with LAs on improving transporter performance or APHA should impose direct action during visits on farm during inspections.*

**Q7: Do you see a need for any exceptions to the maximum journey times and, if so, why?**

**57) Recently hatched chicks**

We would support an exemption from the proposed 24-hour cap for day-old chicks being transported as breeding stock. The UK exports day old chicks for breeding globally, as such the 24-hour cap on all recently hatched chicks may be difficult to achieve. These birds are of high value and there is no interest in the part of the breeding company in having raised mortality or poor bird health upon arrival at their destination eg. providing gel packs to prevent dehydration. The quality rather than the duration of the journey is key in terms of safeguarding welfare.

**58) Mechanisms to take into account exceptional circumstances**

Consideration should be given to how these maximum journey times would be applied to remote areas, as well as what mechanisms would need to be in place to take into account traffic delays, breakdowns and bad weather.

**59)** Recently, due to issues in the provision of abattoir facilities due to Covid-19 and shortages in the supply of carbon dioxide to ensure the effective stunning of poultry, it has been necessary to transport broilers for longer than 4 hours in order to access the nearest abattoir with appropriate facilities and staff. Under these new proposals, there would be a required rest period of 48 hours once the 4 hour time limited was exceeded. This would have potentially resulted in additional stress and welfare risks associated with unloading and re-loading onto transport in order to comply with the proposed 48-hour rest period. In addition, failure to transport broilers to appropriate abattoir facilities would have resulted in very high welfare risks to birds on-farm due to overstocking

**60)** Loading and unloading may risk injury of limbs or wings are caught in the module and birds would have to be re-caught at the end of the rest period and reloaded onto the transport. When executed poorly, the manual catching of poultry can result in birds becoming distressed and injured. Bone breaks, joint dislocations and bruising can be common and result in birds suffering, carcase downgrading and financial loss.<sup>40</sup> Therefore there are instances where the proposed maximum journey time and 48 hour rest period for broilers may result in additional and unnecessary welfare risks, which could be avoided if birds were able to carry on with their journey for an additional few hours in specific circumstances.

**61)** With this in mind, there should also be mechanisms in place to take into account exceptional circumstances such as the temporary inability to access slaughter premises in close proximity. This would ensure that appropriate abattoir facilities can be accessed in a timely manner to maintain welfare at slaughter, prevent unnecessary stressors and welfare risks during rest periods, and prevent overstocking of livestock on-farm, which could result in welfare issues.

**Q8: In the case of such exceptions, what requirements should be put in place to ensure animal welfare is protected?**

**62)** There should be a legal mechanism to allow the competent authority to approve livestock movements where it would be in the best interests of animal welfare to exceed maximum journey times or shorten rest periods.

**63)** As part of this, there should be Standard Operating Procedures (SOPs) in place to state what contingency action will be taken by transporters in these circumstances to ensure welfare is maintained, This would enable enforcement officers to use this to assess whether transporters have complied with the SOP and taken all required measures to safeguard welfare. Contingency

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<sup>40</sup> Humane Slaughter Association (HSA), 2018. Poultry catching and handling. Available at: <https://www.hsa.org.uk/downloads/technical-notes/hsatechnicalnote15-may2018.pdf>

plans should be kept under periodic review and updated in the light of experience when enacted due to exceptional circumstances.

- 64) The welfare of animals pre-, during and post-transportation should be monitored under the direction of a veterinary surgeon in order to manage any potential negative welfare outcomes. Further consideration should be given to implementing outcomes-based approaches to measure and record animal welfare before, during and after transport eg. sensors to measure temperature, exact timings and animal welfare indicators.

**Q9: What would be the financial impact to your business or organisation due to new maximum journey times being implemented? Please explain any impacts provided.**

- 65) Shorter journey times and requirements for more control post stops could create a demand for more control posts and increase approval and inspection demand from APHA. In turn, this would require more APHA resource and additional support from approved vets.

**Q11: Do you agree that a new journey should not start until a minimum of 48 hours have elapsed after the previous journey? Please explain your views.**

- 66) Rest periods are a key determinant of welfare during transport, and that these should be considered alongside changes to maximum journey times. In determining appropriate rest periods, consideration must also be given to where animals would be housed during these rest periods and what mechanisms would need to be in place to ensure that animal welfare standards are maintained and can be verified during this period eg, appropriate environment/housing, bedding, access to food and water. In addition, it is important to recognise that while rest periods are important for welfare, appropriate handling is necessary from trained persons to ensure standards of care are maintained and rest intervals do not cause unnecessary stress to the animals and result in increased risk of injury from loading or unloading.
- 67) Attendants at rest points should have similar responsibility for the animals under their care as hauliers and should have received appropriate certified training in animal handling. Appropriate veterinary care must also be available at rest points in order to recognise and assess any potential welfare issues, manage any negative welfare outcomes and ensure the provision of emergency slaughter if needed.
- 68) As outlined above, there should be mechanisms in place to take into account exceptional circumstances. We would support a legal mechanism to allow the competent authority to approve livestock movements where it would be in the best interests of animal welfare to exceed maximum journey times or shorten rest periods.
- 69) Off-loading and lairage for rest stops may not only increase stress for transported animals, but can also increase biosecurity risk. It is therefore important that any control posts or collection centres have appropriate regulatory controls to both safeguard welfare and mitigate any animal disease risk.
- 70) Consideration should also be given to how these proposals may disproportionately affect those moving livestock and horses to shows, competitions, leisure events and exhibitions.

**Q12: Do you agree that there should be a minimum 7-day rest period for cattle? Please explain your views.**

- 71) We are concerned that this proposal is not practical. We strongly recommend that Defra and Welsh Government set out the evidence that underpins this proposal and consider further evidence before they implement it, including:

- Meléndez DM, Marti S, Haley DB, Schwinghamer TD, Schwartzkopf-Genswein KS

(2020) Effect of transport and rest stop duration on the welfare of conditioned cattle transported by road. PLOS ONE 15(3): e0228492. <https://doi.org/10.1371/journal.pone.0228492>

- S. Marti, R. E. Wilde, D. Moya, C. E. M. Heuston, F. Brown, K. S. Schwartzkopf-Genswein, Effect of rest stop duration during long-distance transport on welfare indicators in recently weaned beef calves, *Journal of Animal Science*, Volume 95, Issue 2, February 2017, Pages 636–644, <https://doi.org/10.2527/jas.2016.0739>
- Earley, B., Murray, M. & Prendiville, D.J. Effect of road transport for up to 24 hours followed by twenty-four hour recovery on live weight and physiological responses of bulls. *BMC Vet Res* 6, 38 (2010). <https://doi.org/10.1186/1746-6148-6-38>

**72)** Further, this proposal would risk different consignments being placed in closed proximity in lairage and at rest points, which could pose a risk to biosecurity and also compromise the health status of consignments.

**73)** As outlined above, attendants at rest points should have similar responsibility for the animals under their care as hauliers and should have received appropriate certified training in animal handling. Appropriate veterinary care must also be available at rest points in order to recognise and assess any potential welfare issues, manage any negative welfare outcomes and ensure the provision of emergency slaughter if needed. Therefore, further clarity is needed as to whether there would be enough appropriately trained stockpeople to oversee and work at these rest points to maintain animal health and welfare across the 7-day rest period.

**74)** We are also concerned that the proposed 7-day rest period for cattle may lead to false movement recording in order to give appearances that movements are complying with this requirement.

## Thermal conditions and ventilation

### General comments on proposals

**75)** We recognise that extremely high temperatures within the vehicle are a particular welfare risk for livestock and horses that are being transported. However, we note that colder temperatures are less of a welfare issue, many cattle, sheep and pigs are reared in ambient temperatures below 5 degrees, and it is possible to mitigate the effect of these lower temperatures on livestock during transport where needed through appropriate stocking densities, bedding and straw, and the use of rugs or coats for horses.

**76)** It is also important to recognise that, as set out in the FAWC report, the thermoneutral zones and lower critical temperatures vary widely according to species, stage of production and coat of the animals involved:

*“The temperature range over which and animals remains physiologically and psychologically unstressed is heavily influenced by factors including the quality of the journey, environmental considerations (air speed, moisture/humidity) and that of the animal itself (coat length and wetting, previous adaptation, diet/metabolism).”<sup>41</sup>*

**Q13: Do you agree that we should prohibit both short and long poultry journeys when the external temperature is outside of a temperature range of 5-25oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the journey by means of a thermo-regulation system, and that this temperature range should be 5-25oC? Please explain your views.**

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<sup>41</sup> FAWC, 2019. Opinion on the welfare of animals during transport. Available at: <https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

- 77) We note that poultry have higher dead-on-arrival (DOA) rates in extreme temperatures than other species. We therefore support the aims of this proposal to ensure that no animals are transported in extreme weather conditions which may impact their welfare and cause unnecessary suffering. However, we are concerned that this proposal is not workable in practice and may result in unintended consequences.
- 78) The proposal would prevent many existing vehicles from transporting birds on many days of the year, and potentially result in overstocking on-farm. At present, hauliers use curtains and adjust stocking densities in crates to ensure the thermal comfort of birds. It is also important to recognise that the cost of adding a thermo-regulation system to a vehicle is considerable, therefore consideration would need to be given as to how to Government could appropriately support industry to comply with this proposal. In addition, such changes would likely increase the loading and unloading times of these lorries making it even more difficult to comply with the proposed 4 hour maximum journey time.
- 79) FAWC recommends that more research and evidence is required to determine acceptable temperature ranges for different species and classes of animals. With this in mind, FAWC also state that a maximum and minimum temperature should also be devised for all animals (farm, equine and companion animals) where they are not permitted to be transported outside of these extreme temperatures ranges. This should be a research priority due to the increased levels of extreme temperature ranges that are being experienced, and are likely to be experienced, in future. Vehicle design should also be considered when considering the thermal requirements of animals.
- 80) Government should therefore commission further research to determine appropriate temperature ranges for different species, as well as the impact of vehicle design, so that the proposed ranges specified in legislation are species-specific (including minority species such as deer, goats, and camelids) and evidence-based.
- 81) Until such evidence is available, we would support the FAWC recommendation that animals should not be transported in temperatures above 35°C unless the vehicle can regulate temperature range, and the use of the acceptable species-specific temperature ranges as set out in Appendix C of the FAWC opinion on the welfare of animals during transport should be used as a guide and only when outside temperatures are exceeded i.e. outside 5°C to 30°C.. Where temperature ranges are not defined in Appendix C, then the current 1/2005 Regulation should be applied to all other animals.
- 82) In addition, there should be Standard Operating Procedures (SOPs) in place to state what action will be taken by transporters to ensure that temperature and ventilation are monitored and maintained throughout journeys. This would enable enforcement officers to use this to assess whether transporters have complied with the SOP and taken all required measures to safeguard welfare.

**Q14: What would be the financial impact to your business or organisation of prohibiting both short and long poultry journeys when the external temperature range is outside of 5-25oC? Please explain any impacts provided.**

- 83) As above, the cost of adding a mechanical thermo-regulation system to a vehicle is considerable, therefore consideration would need to be given as to how to Government could appropriately support industry to comply with these proposals.
- 84) Consideration would need to be given to the appropriate lead-in period required to allow transporters to retro-fit these systems. Further clarity is also required as to the required specification of mechanical thermo-regulation systems and required functions eg. provision of heating or air conditioning, or if both are to be required.

**Q15: Do you agree that we should prohibit both short and long livestock and horse journeys when the external temperature is outside of a temperature range of 5-30oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the**

**journey by means of a thermo-regulation system, and that this temperature range should be 5-30°C? Please explain your views.**

- 85)** We support the aims of this proposal to ensure that no animals are transported in extreme weather conditions which may impact their welfare and cause unnecessary suffering. However, we are concerned that this proposal is not workable in practice and may result in unintended consequences. The temperature often falls below 5 degrees in the UK during the winter months, therefore this proposal could result in a sizeable amount of livestock movements being put on hold during the colder months, which could result in overstocking of animals on-farm and negative welfare impacts. In addition, the proposal does not appear to take into account that temperatures may vary at different points in the journey and different parts of the country. Paired with this, it is important to recognise that - with appropriate ventilation and stocking density - livestock may be able to maintain a temperature above 5 degrees within the vehicle throughout the journey.
- 86)** FAWC recommends that more research and evidence is required to determine acceptable temperature ranges for different species and classes of animals. With this in mind, FAWC also state that a maximum and minimum temperature should also be devised for all animals (farm, equine and companion animals) where they are not permitted to be transported outside of these extreme temperatures ranges. This should be a research priority due to the increased levels of extreme temperature ranges that are being experienced, and are likely to be experienced, in future. Vehicle design should also be considered when considering the thermal requirements of animals.
- 87)** Government should therefore commission further research to determine appropriate temperature ranges for different species, as well as the impact of vehicle design, so that the proposed ranges specified in legislation are species-specific (including minority species such as deer, goats, and camelids) and evidence-based.
- 88)** Until such evidence is available, we would support the FAWC recommendation that animals should not be transported in temperatures above 35°C unless the vehicle can regulate temperature range, and the use of the acceptable species-specific temperature ranges as set out in Appendix C of the FAWC opinion on the welfare of animals during transport should be used as a guide and only when outside temperatures are exceeded i.e. outside 5°C to 30°C.. Where temperature ranges are not defined in Appendix C, then the current 1/2005 Regulation should be applied to all other animals.
- 89)** In addition, there should be Standard Operating Procedures (SOPs) in place to state what action will be taken by transporters to ensure that temperature and ventilation are monitored and maintained throughout journeys. This would enable enforcement officers to use this to assess whether transporters have complied with the SOP and taken all required measures to safeguard welfare.

## **Space allowances**

**Q21: Do you agree that we should use allometric principles as a basis for future space allowance calculations? Please explain your views.**

- 90)** We recognise that space allowances and stocking density are an important determinant of welfare during transport. Space allowance will have an impact on temperature and humidity, consideration must therefore also be given as to how to achieve a space allowance that will mitigate against negative welfare outcomes and balances this against potential negative effects on the transport environment in which animals are travelling.
- 91)** Both FAWC and EFSA<sup>42</sup> have supported the use of allometric principles to calculate space allowances in transport, and that stocking density for horses should be determined using kg/m<sup>2</sup> and not m<sup>2</sup>/ animal. With this in mind, we support the proposal to use allometric principles as a future basis for future space allowance calculations. However, we recognise that implementing

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<sup>42</sup> EFSA, 2011. Scientific Opinion Concerning the Welfare of Animals during Transport  
<https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2011.1966>

allometric principles in practice may be complex, therefore further consideration should be given as to how this will be workable in practice, ensuring that any system is clear and easy to understand. Consideration could be given to replicating the current provision in welfare regulations which requires pens in a lairage have designated capacity for the species displayed clearly.

**Q22: Do you think that reforms to space allowances based on allometric principles should apply to both short and long journeys? Please explain your views.**

- 92) We support this proposal, animals transported in connection with economic activity should be afforded the same protections regardless of journey length. Evidence suggests that transport conditions and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.<sup>43,44,45,46</sup>
- 93) However, we recognise that implementing allometric principles in practice may be complex, therefore further consideration should be given as to how this will be workable in practice, ensuring that any system is clear and easy to understand.

**Headroom allowances**

**Q23: Do you agree with the proposed species-specific headroom requirements?**

- 94) We broadly support the proposed headroom allowances recommended by FAWC, and the FAWC recognition that further research into species-specific headroom allowances would be beneficial to refine these proposals further. The Government should commission research to enable this.
- 95) For horses, we recommend that there should also be at least 10cm on either side of animals to partitions, with space of at least 15 cm at front and back as horses must be able to lower their heads to prevent the development of respiratory issues.
- 96) SVS highlight that guidance on the height of the space which should be provided above a sheep's head during transit will depend on the animal's predominant head position while in the lorry and may be better defined from a fixed, rather than moving, point on the sheep, for example, the shoulder. More evidence may be needed before headroom requirements for sheep can be specified.
- 97) We would also welcome further clarity as to why there are differences in headroom requirements for bovines of beef and dairy breeds, as well as further information on the evidence which supports these proposals.

**Q24: Do you think that the proposed species-specific headroom requirements should apply to both short and long journeys? Please explain your views.**

- 98) We support this proposal, animals transported in connection with economic activity should be afforded the same protections regardless of journey length. Evidence suggests that transport

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<sup>43</sup> Cockram, M.S., 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science*, 106(4), pp.234-243.

<sup>44</sup> Warriss, P.D., Brown, S.N., Knowles, T.G., Kestin, S.C., Edwards, J.E., Dolan, S.K., Phillips, A.J., 1995. Effects on cattle of transport by road for up to fifteen hours. *Veterinary Record*, 136, 319-323.

<sup>45</sup> Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

<sup>46</sup> Nielsen, B.L., Dybkjær, L. and Herskin, M.S., 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal*, 5(3), pp.415-427.

conditions and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.<sup>47,48,49,50</sup>

## Sea transport

**Q26: Do you agree that we should prevent animals from being transported in rough weather at sea and that animals should not be transported during Beaufort Wind Force 6 or above? Please explain your views.**

- 99) We agree with this proposal in principle, however there would need to be clearly defined contingency plans in place to ensure provision of appropriate temporary accommodation for animals in the event of sea journeys being delayed/cancelled due to poor weather conditions.
- 100) As part of this, consideration should be given to who would be responsible for providing this accommodation, how welfare standards will be met and verified, maximum duration of time permitted in temporary accommodation, and the impact of loading and unloading into temporary accommodation on the animals being transported.
- 101) In addition, for all weather scenarios, consideration should also be given to how the design of the vessel will impact on welfare conditions eg. whether the vessel has stabiliser to ensure a smooth crossing for transported animals in rough weather conditions.
- 102) Given the short time frame in which day-old chicks are required to be transported, consideration should be given to exempting day-old chicks from this proposal to prevent to ensure they arrive at farm in the required time frame.
- 103) Potential improvements to air transport conditions should also be considered

## Exceptions

**Q28: Do you think that there should be any exceptions to the previously mentioned proposals alongside the specific exceptions already outlined, excluding the proposal to prohibit live exports for slaughter and fattening? Please provide evidence.**

- 104) There should be legal mechanism for the competent authority to approve livestock movements that do not comply with the proposed regulations where it would be in the best interests of animal welfare to do so eg. permitting non-compliance with fitness to travel requirements to ensure the immediate evacuation of animals in the event of flooding to prevent further harm, temporary inability to access slaughter premises in local proximity, seizing animals due to wider animal welfare concerns.
- 105) As part of this, there should be Standards Operating Procedures (SOPs) in place to state what contingency action will be taken by transporters in these circumstances to ensure welfare is maintained, This would enable enforcement officers to use this to assess whether transporters have complied with the SOP and taken all required measures to safeguard welfare. Contingency plans should be kept under periodic review and updated in the light of experience when enacted due to exceptional circumstances.
- 106) The welfare of animals pre-, during and post-transportation should be monitored under the direction of a veterinary surgeon in order to manage any potential negative welfare

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<sup>47</sup> Cockram, M.S., 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science*, 106(4), pp.234-243.

<sup>48</sup> Warriss, P.D., Brown, S.N., Knowles, T.G., Kestin, S.C., Edwards, J.E., Dolan, S.K., Phillips, A.J., 1995. Effects on cattle of transport by road for up to fifteen hours. *Veterinary Record*, 136, 319-323.

<sup>49</sup> Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

<sup>50</sup> Nielsen, B.L., Dybkjær, L. and Herskin, M.S., 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal*, 5(3), pp.415-427.

outcomes.

**Q30: Do you think that it should be possible to obtain permission to use an exception on an ongoing basis to avoid the need for transporters to apply before every applicable journey? Please explain your views**

**107)** Yes, in specific circumstances there may be times where it is appropriate to grant permission for an ongoing exception for a limited and clearly defined period eg. if there were abattoir closures for several weeks or months which would increase journey times. However, it is paramount that these movements are continuously monitored, reviewed and data is collected to assess the impact on animal health and welfare.