



BVA Scottish Branch, AGV, BCVA, BEVA, BVPA, GVS, PVS, SVS and VPHA response to the Scottish Government consultation on The Farm Animal Welfare Committee's Opinion on The Welfare of Animals During Transport and Scottish Government Response

- 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) BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.
- 3) We have developed our response in consultation with BVA Scottish 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 Cattle Veterinary Association (BCVA)** is a specialist cattle division of the BVA comprising 1,250 members, of whom approximately 950 are practising veterinary surgeons working with cattle in farm animal veterinary practice.
 - 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.
- 4) We welcome the opportunity to respond to this consultation on FAWC's Opinion on the welfare of animals during transport and the Scottish Government's response to proposals.
 - 5) 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. 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.
 - 6) 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. It is essential that APHA and local authorities have sufficient resource to monitor the implementation of any new proposals, and investigate any resulting non-compliances, by ring fencing funding for the effective enforcement of any new proposals.
 - 7) The UK governments should also commission further research to address species-specific knowledge gaps as identified by FAWC to allow for the evidence-based refinement of future regulations.
 - 8) Any future policy proposals should recognise variations between the species in how and why transportation occurs. Consideration should also be given as to how future proposals may affect those moving livestock and horses to shows, competitions, leisure events and exhibitions.
 - 9) 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.¹²³⁴ 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 current legal requirements (those derived from European Community Regulation 1/2005 and set out in the UK Welfare of Animals (Transport) Orders⁵⁶ and Regulations⁷⁸) that are in force to protect the health and welfare of livestock during transport.⁹ 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.
- 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.

Q1: Do you agree with the FAWC recommendations for future research and the Scottish Government's position and proposed course of action? Please provide any further relevant information.

- 10)** We support the FAWC recommendations for future research to address species-specific knowledge gaps and improve understanding of the wider determinants of welfare before, during and after transport. We also support FAWC's recommendation that data should be collected before, during and for at least two weeks post transport to assess any long-term implications to the health, morbidity and mortality of the animals after transport.
- 11)** We are aware of a current research project being undertaken at the University of Bristol assessing the welfare of farmed deer during transport and current practices. Data is being collected from the two main abattoir sites that receive the vast majority of farmed deer in the UK, which should help to provide an informed picture of deer welfare outcomes before, during and after transport.
- 12)** As outlined above, legislative improvements to safeguard the welfare of animals during transport should be evidence-based and informed by a welfare outcomes approach. We welcome Scottish Government's acknowledgement of this in its response to these proposals and recommend that this is given priority.

Q2: Do you agree that prior permission should be obtained from the relevant UK authority for some journeys exporting live animals and permission should only be granted if the reasons for not undertaking a shorter alternative journey are justified? Please provide any further relevant information

- 13)** 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 FAWC opinion, in some cases animals are being

¹ Defra: Transcontinental road transport of breeder pigs - effects of hot climates

² Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

³ Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

⁴ 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

⁵ [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

⁶ [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

⁷ [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

⁸ [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

⁹ 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.***

transported past UK abattoirs to be slaughtered overseas.¹⁰ Any future policy proposals must clearly define the type of transport within scope eg. live export for slaughter and fattening, live export for breeding, or domestic movements.

- 14) No animal should be exported and then raised in systems previously banned in this country or exported for non-stun slaughter. 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.
- 15) It is paramount that the UK governments take a holistic approach when considering additional controls on live animal export, including the wider determinants of welfare before, during and after transport, whether that be for slaughter, fattening or breeding.
- 16) We recognise that FAWC's proposal would provide a mechanism to control, and potentially reduce, the number of live export journeys. However, we are concerned that, if implemented, this policy would result in delegation of decision-making to APHA vets, requiring them to navigate complex and potentially conflicting considerations on aspects of welfare, ethics and economics and placing a disproportionate burden on the individual officer. If implemented, this proposal would therefore require clear guidance to support decision-making. There would also need to be a regular report to Scottish ministers so that Ministers could retain oversight; the report should also provide evidence of regulatory controls on transport and production in exported countries.
- 17) Equally, we do not support a ban on live exports. Such a ban would oversimplify the full picture of animal welfare that must be taken into account when considering improvements to animal welfare during transport. It is important to emphasise that with regard to a proposed ban on live exports, AGV and BCVA would support such a ban, with emphasis being put on work to mitigate the risks to welfare that could emerge as a consequence.
- 18) Evidence also 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.^{11,12,13,14} Consequently, proposals to improve animal welfare during transport should not disproportionately focus on journey length, and holistically explore improvements to the wider determinants of welfare during transport.
- 19) Specific consideration for live exports of poultry
If this proposal is progressed, poultry live exports for slaughter, further production and breeding should be exempted. 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 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.
- 20) In addition, in the poultry sector live chicks are exported, then reared and slaughtered in other countries. Whilst it is 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.
- 21) Further, day-old chicks are able to survive on their yolk sac reserves to support them during the first

¹⁰ 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>

¹¹ 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.

¹² 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.

¹³ Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. Livestock Handling and Transport: Theories and Applications, p.143

¹⁴ 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.

72 hours of life.¹⁵ 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.¹⁶ However, where chicks are transported, it 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.”

Examples where live export and longer journeys (complying with legislative requirements) may be necessary

22) Highlands and Islands

Orkney and Shetland are predominantly livestock producing areas. Most of the livestock production which has to be transported to Aberdeen from Shetland is mainly sheep comprising store lambs and ewes for further feeding. Orkney is predominantly cattle and can produce finished cattle, but due to the closure of the slaughterhouse, all animals have to be shipped to the Scottish mainland either for slaughter or for further feeding.

23) 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.¹⁷

24) 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 0.5% of dairy calves born in 2014.¹⁸ This decrease is largely due to improved opportunities in the UK for rearing high-welfare veal and beef and the closure of overseas markets.

25) Consideration should therefore be given to the fact that banning or significantly restricting 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](#). Similarly, this would run against other industry efforts to move away from euthanasia, such as Arla's 'Every calf has a value' policy, which sets out that that that no calf will be slaughtered or euthanised within the first eight weeks of life.

26) 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

¹⁵ 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>

¹⁶ 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>

¹⁷ AHDB 2018/BCMS, referenced in <http://beefandlamb.ahdb.org.uk/wp-content/uploads/2018/03/CHAWGupdate-on-Dairy-bull-calves-March-2018.pdf>

¹⁸ Ibid.

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.

- 27) In this context, where the export of dairy bull calves is undertaken in compliance with 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.
- 28) [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).
- 29) [Ensuring suitable abattoir facilities](#)
It is also 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. For example, movements from remote areas in the Highlands and Islands to the mainland to access suitable slaughter facilities; there is no slaughterhouse facility in the Orkney Isles local butchers now have to transport their cattle and sheep to Dingwall slaughterhouse on the Scottish mainland which is approximately a 16 hour journey and have the carcasses shipped back.
- 30) 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 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.
- 31) Further, the total number of abattoirs in the UK has declined.¹⁹ 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.
- 32) 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) Orders²⁰²¹ and Regulations²²²³ 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

¹⁹ 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/>

²⁰ [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

²¹ [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

²² [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

²³ [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

distance) in terms of safeguarding the health and welfare of animals during transport.^{24,25,26,27}

- 33)** 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.
- 34)** 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.²⁸ 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.²⁹
- 35)** 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.
- 36)** 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.

Q.3. Do you agree with the Scottish Government's position on determining fitness for transport and proposed course of action? Please provide any further relevant information.

- 37)** All those involved in the handling of animals during transport should familiarise themselves with, and adhere to, best practice to promote positive animal welfare. We therefore strongly support FAWC's recommendation of improved promotion and application of the EU animal transport guides by government and industry. We welcome the Scottish Government's support for the FAWC recommendations on determining fitness to travel and ways to improve compliance, as well as produce a more specific definition of fitness for transport in future legislation.

Q.4. Do you agree that there should be no distinction between registered and unregistered horses in future legislation on welfare during transport? Please provide any further relevant information.

- 38)** In the UK most horses are transported for leisure (amateur riders), competition (professional sport and racing), at the point of sale (change of ownership) and for breeding (mares being covered). This results in a much greater range in transportation means, distance, conditions than might exist for other species.
- 39)** We recognise the current disparity in the level of legislative protections afforded to registered and unregistered horses. At present, registered horses and ponies are exempt from certain aspects of travel regulations for journeys of more than eight hours as they are deemed 'high performance' and

²⁴ 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.

²⁵ 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.

²⁶ Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

²⁷ 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.

²⁸ 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/>

²⁹ 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

their conditions of transport (as valuable animals) are assumed to be above the minimum standard. These exemptions are:

- Transport without the requirement for a Journey Log.
- Transport without being restricted by water and feed intervals, journey times, and rest periods as set for unregistered horses and ponies.
- Transport of animals of four months or younger without being accompanied by their dam.

40) However, all horses have the potential to become low value even if they are registered, (for example through injury) but still retain their 'registered' status. This means that the derogation may continue to be used and presents a loophole in terms of safeguarding the welfare of vulnerable registered horses in transport.

41) Regardless of their classification, all horses being transported have the same welfare needs that should be met during transport. 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. Consequently, we support FAWC's recommendation that there should be no distinction between registered and unregistered horses in future legislation on welfare during transport.

Q5. Do you agree with the Scottish Government's position on the means of transport and proposed course of action? Please provide any further relevant information.

42) We agree with the Scottish Government's position that a proportionate and risk-based approach towards the application of statutory regulation should apply in relation to vehicle approval, certification and inspection. Given that inspections are currently only required for vehicles used in journeys over 8 hours, it is appropriate for the Scottish Government to consider where the boundaries of statutory regulation of vehicles should lie, and what those specific risk-based and proportionate regulatory requirements should be. This could include considering to what extent different requirements should apply to commercial journeys and to other journeys

43) We strongly support the Scottish Government's recognition that the quality of a journey can affect the welfare of animal during transport. In fact, it is important 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.^{30,31,32,33}

44) We would support the collection of additional data to assess journey quality, including the use of accelerometers and extending the use of GPS tracking devices for those vehicles covered by statutory regulation. Similarly, we would also support the improved use of technology during handling operations to provide more opportunities to verify and observe handling practices relating to transport. For example, CCTV on lorries for loading/unloading or body cameras on animal handlers.

45) Further consideration should be given to implementing outcomes-based approaches to measure animal welfare during transport eg sensors to measure temperature, exact timings and animal welfare indicators. This may require retro-fitting transporters with appropriate monitoring or thermo-regulation systems, Government would need to determine appropriate lead-in times and funding to support industry to comply with any requirements of this kind.

³⁰ 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.

³¹ 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.

³² Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

³³ 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.

Q.6. Do you agree with the Scottish Government's position on the maximum time an animal may spend at market and proposed course of action? Please provide any further relevant information.

- 46) We support the Scottish Government's position that a review of existing requirements applying to animals at market should be considered, including the maximum time at market, and that this could specifically set out the case for a new animal welfare licensing regime to be introduced for markets.
- 47) Given that animal welfare in transport regulations set maximum journey times, with additional requirements for rest periods, we support the Scottish Government's position that they should also consider setting a maximum time an animal can spend at market. In addition, the Scottish Government should consider measures to ensure the provision of appropriate feed and water for livestock at markets.
- 48) Any review should also consider the training of those involved in handling animals at market, facility design, access for livestock to food, water, and appropriate bedding, contingency plans should time at market exceed the recommended maximum, as well as the improved use of technology during handling operations to provide more opportunities to verify and observe handling practices. For example, CCTV on lorries for loading and unloading, and at markets and collection centres, as well as body cameras on animal handlers at markets and collection centres.
- 49) It is also important to recognise that a maximum time at market may have the unintended consequence of reducing rest times, and therefore compromising welfare. In addition, in terms of biosecurity and disease control, it is important to consider that the longer livestock are in markets, the greater likelihood there is of disease spread to, and from, other livestock. This may also result in less opportunity for cleansing and disinfection, as well as fallow periods.
- 50) 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 at the market or have access to water, the time in the market should be considered as part of the journey time.

Q.7. Do you agree with the Scottish Government's position on space allowances for animals in transport and proposed course of action? Please provide any further relevant information

- 51) 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. We support the Scottish Government's recognition of this.
- 52) Both FAWC and EFSA³⁴ have supported the use of allometric principles to calculate space allowances in transport, and that stocking density for horses should be determined using kg/m² and not m²/ animal. With this in mind, we support the proposal to use allometric principles as a future basis for space allowance calculations. We agree with the Scottish Government's position that consideration should be given as to how this will be workable in practice.
- 53) We support the Scottish Government's position that proposals for future regulatory reforms should include FAWC's species-specific headroom allowances. We also recognise that FAWC recommend further research into species-specific headroom allowances would be beneficial to refine these proposals further, the Scottish Government should commission research to enable this.

³⁴ EFSA, 2011. Scientific Opinion Concerning the Welfare of Animals during Transport
<https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2011.1966>

- 54) For horses in particular, 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.
- 55) 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.

Q.8. Do you agree with the Scottish Government's position on transport practices and proposed course of action? Please provide any further relevant information.

- 56) We support the Scottish Government position that in principle all animals should be protected during transport by appropriate legislation. We agree with the Scottish Government approach to review where the boundaries of statutory regulation lie, and that they should consider how to apply a risk based and proportionate approach in relation to authorisations, Certificates of Competence and other aspects of statutory regulation
- 57) In this respect, our view is that:
- All drivers and farmers intending to transport livestock in connection with an economic activity should 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.
 - All drivers and farmers intending to transport livestock in connection with an economic activity should receive certified training on the factors that make an animal fit or unfit for transport.

- 58) We would also recommend that there should be greater regulatory oversight of the transport practices involved in the commercial transport of companion animals (as opposed to the non-commercial transport of pets). However, careful consideration would be required when considering how we define 'commercial' because of the risk that individuals importing dogs may try to exploit any potential loopholes.

Q.9. Do you agree with the Scottish Government's position on thermal conditions and ventilation for animals in transport and proposed course of action? Please provide any further relevant information.

- 59) We agree with the Scottish Government's recognition that thermal conditions and ventilation are a key determinant of animal welfare during transport, and we welcome their desire to ensure that requirements reflect the latest evidence and understanding.
- 60) 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, curtains, and the use of rugs or coats for horses. Deer are also well equipped to cope with a range of temperatures provided they have plenty of water – ideally spraying - in hot conditions and shelter from wind in very cold conditions. SVS also state that humidity is more likely than temperature alone to affect the welfare of sheep.
- 61) 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).³⁵

- 62) 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 temperature 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.
- 63) We therefore support the Scottish Government position that future regulatory requirements could include setting a maximum and a minimum external temperature for permissible journeys, that any new limits should be based on science and evidence, and that any regulatory requirements relating to these limits should also consider the ability of the vehicle to manage the temperature experienced by animals being transported.
- 64) 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. In addition, when animals are transported in ambient temperatures that fall outside of the FAWC species-specific guidance, transporters should be required to carry out a risk assessment.
- 65) 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.

Q.10. Do you agree with the Scottish Government's position on maximum journey length and proposed course of action? Please provide any further relevant information.

- 66) We agree with the Scottish Government's position on maximum journey length and proposed course of action, particularly with regard to considering how these maximum times would be applied in remote areas, and the overall resulting impact on animal welfare, if they were to be adopted.
- 67) 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 "journey time" in the systematic review is not clear. Further clarity is required as to whether it refers to time spent moving, or whether it includes loading and unloading time.
- 68) With regard to the approval of journeys greater than 21 hours, APHA should be required to produce a report that would be shared with Scottish Ministers to ensure ministerial oversight and accountability.
- 69) It is important to note that FAWC acknowledges these recommendations 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. Scottish Government should commission this research to further enable further evidence-based refinement of these proposals in the future.

³⁵ 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>

70) It is equally 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.^{36,37,38,39} APHA data from 2017 cited in the FAWC opinion indicated that under the current animal transport regulations the highest number of animal welfare non-compliances recorded was for animals that were transported that were not fit to travel.⁴⁰

71) 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 at the market or have access to water, the time in the market should be considered as part of the journey time.

72) 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.

73) Concerns around proposed maximum journey time for broilers

We note that FAWC's proposed maximum journey time for broilers of 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.

74) 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.

75) 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 cases of Avian Influenza, the food chain would be severely disrupted.

76) Transport of unweaned animals

We are concerned that the proposed maximum journey time of 9 hours for unweaned animals may prevent movement of unweaned animals from the Northern Isles if transport at sea is counted as part of the total journey time.

77) Deer

The two main abattoirs for farmed deer in the UK are situated in Doncaster and Fife. It is important to recognise that journey distances and travelling time to these two main abattoirs reflect the limited number of premises that have the facilities and species-specific expertise to handle and slaughter deer. This situation may change if the small national farmed deer herd

³⁶ 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.

³⁷ 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.

³⁸ Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

³⁹ 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.

⁴⁰ 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>

continues to increase in size and assuming that the commercial arrangements with large supermarkets remain in place.

78) Mechanisms to take into account exceptional circumstances

Consideration should therefore 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.

79) 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. Failure to transport broilers would have resulted in very high welfare risks to birds on-farm due to overstocking.

80) 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.

81) 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.

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

83) 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. This may require retro-fitting transporters with appropriate monitoring systems or thermo-regulation systems. Government would need to determine appropriate lead-in times and funding to support industry to comply with any requirements of this kind.

Q.11 Do you agree with the Scottish Government's position on mid-journey breaks and proposed course of action? Please provide any further relevant information.

84) We support the Scottish Government's position that, in line with better regulation principles, the maximum journey times and rest periods relating to drivers and to animals being transported should be as coherent, mutually consistent and as aligned as possible. We agree that it would be beneficial for the Scottish Government to further explore how far and in what way these time periods could be aligned, and we agree that further evidence gathering and research could usefully inform these considerations.

85) We agree that 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. Consideration should also be given to how time at markets would align with drivers' hours and breaks.

- 86) 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.
- 87) 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.

Q.12 Do you agree with the recommendation that anyone who transports livestock, poultry or horses should require transporter authorisation and a Certificate of Competence, including if they only transport animals on short journeys? Please provide any further relevant information.

- 88) 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.^{41,42,43,44} Therefore, regardless of journey length, our view is that:
- All drivers and farmers intending to transport livestock in connection with an economic activity should 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.
 - All drivers and farmers intending to transport livestock in connection with an economic activity should receive certified training on the factors that make an animal fit or unfit for transport.
- 89) We would also recommend that there should be greater regulatory oversight of the transport practices involved in the commercial transport of companion animals (as opposed to the non-commercial transport of pets). However, careful consideration would be required when considering how we define 'commercial' because of the risk that individuals importing dogs may try to exploit any potential loopholes.

Q.13 Do you agree with the Scottish Government's position on transportation of animals by sea and proposed course of action? Please provide any further relevant information.

- 90) We agree with Scottish Government's position on transportation of animals by sea and proposed course of action. We strongly support the Scottish Government's assertion that future proposals should also take into account the design of the vessel involved and recognise that transport in various weather conditions may benefit the welfare of animals that need to be moved from islands to better conditions as part of the normal seasonal pattern of livestock movements. Consideration should be given to the overall responsibility of the ship captain, so as to ensure that they only transport animals across sea in suitable weather and sea conditions.
- 91) The training of staff who are loading onto, and unloading from, vessels is also key to the successful transportation of livestock by sea, as very little can be done -especially with cattle- to change things once the boat has set sail. Staff need to know the transport legislative requirements, and best practice in handling animals and loading onto specific vessels eg livestock cassettes.
- 92) We also strongly agree that there should be clearly defined contingency plans in place to ensure provision of appropriate temporary accommodation for animals in the event of sea journeys

⁴¹ 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.

⁴² 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.

⁴³ Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

⁴⁴ 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.

being delayed/cancelled due to poor weather conditions. 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.

- 93) Further consideration should be given to the regulatory impact of this wider proposal and resource required for effective implementation. In addition, it is important to consider how future proposals would apply to different kinds of sea journeys that are currently undertaken eg. short journeys between islands in close proximity, and longer sea journeys such as those from Shetland to Aberdeen. In both Orkney and Shetland, internal movements from the outer isles are all in lorries on Ro-Ro ferries with only a few exceptions. As such, these journeys are considered travelling time, but journeys are not excessive at 3-4 hours maximum and usually much less, before the animals are unloaded either at the market or at the harbor lairages.
- 94) Given the short time frame in which day-old chicks are required to be transported, we would support exempting day-old chicks from these proposals to ensure they arrive at farm in the required time frame.

Q.14. Do you agree the Scottish Government should consider the proposed review on research into transportation by rail or air alongside other research priorities? Please provide any further relevant information

- 95) We agree that the Scottish Government should consider the proposed review on research into transportation by rail or air alongside other research priorities.

Q.15 Do you agree with the Scottish Government's position on the collection and use of feedback to identify welfare risks in transport and proposed course of action? Please provide any further relevant information.

- 96) We welcome the Scottish Government's recognition of the importance of data collection and feedback before, during and after transport to identify and prevent welfare risks, as well as support effective enforcement of welfare during transport regulations.
- 97) We would support the implementation of outcomes-based approaches to measure and record animal welfare before, during and after transport eg sensors to measure temperature, exact timings. Improved use of CCTV, and animal welfare indicators. This may require retro-fitting transporters with appropriate monitoring or thermo-regulation systems. Government would need to determine appropriate lead-in times and funding to support industry to comply with any requirements of this kind.
- 98) 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.⁴⁵
- 99) Poor welfare or hygiene on arrival at the abattoir may also be indicative of welfare and biosecurity issues on-farm or during transport. We would therefore support the enhancement of the food chain information declaration to include a welfare component (based on outcome measures), as well as a recorded assessment of welfare on arrival at the abattoir and assessment of dead on arrival (DOA) animals, which could form part of this feedback loop.

Q.16 Do you agree with the Scottish Government's position on the enforcement of welfare of animals in transport and proposed course of action? Please provide any further relevant information.

100) We support the Scottish Government's position on the improved enforcement of the welfare of animals in transport. Any increase in regulatory activity must be costed, supported and resourced and should not lead to a reduction in other essential regulatory activity.

101) We consider that there is currently close and effective liaison between APHA, Local Authorities and Food Standards Scotland, however an independent review of this relationship may be beneficial to ensure continued collaboration and prioritisation of animal welfare. We also support the Scottish Government's agreement that more education, training, guidance and other support to enable and promote improved compliance should be considered.

Q.17 Do you agree with the Scottish Government's position on post-export protection of animal welfare and proposed course of action? Please provide any further relevant information.

102) 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. We therefore strongly support the Scottish Government's position that in order for export journeys not to be associated with worse animal welfare, government should take into account the welfare protections applying to animals after they have arrived at their destination.

103) We particularly welcome the Scottish Government's agreement that consideration of future regulatory requirements should include what sort of approvals regime to apply to export journeys, including what sort of assurances to require about the post-export protections applying to animals after they have arrived abroad. Further detail is required about how and who would develop the criteria for this regime, as well as who would assess, monitor and enforce conditions for travel.