

# BVA Position on the welfare of livestock during transport

## Executive summary

Movement of animals is an intrinsic part of livestock<sup>1</sup> keeping, production and distribution of genetics to provide the stock necessary to feed the rest of the world.<sup>2</sup> The scale will vary widely from local area movements, to pastures, markets, new premises to those of greater distance such as regional, national and long-distance international moves.

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>3456</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.

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<sup>1</sup> For the purposes of this position statement the term 'livestock' is understood to include food producing animals and equidae.

<sup>2</sup> 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.

In addition, in the poultry sector day-old chicks are able to survive on their yolk sac reserves to support them during the first 72 hours of life.<sup>2</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.

Further, 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.

<sup>3</sup> Defra: Transcontinental road transport of breeder pigs - effects of hot climates

<sup>4</sup> Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

<sup>5</sup> Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

<sup>6</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

BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders<sup>78</sup> and Regulations<sup>910</sup>) that are in force to protect the health and welfare of livestock during transport.<sup>11</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.

**To build on existing legal requirements, our specific recommendations to improve the health and welfare of livestock during transport are set out below:**

**Recommendation 1:** In order to improve welfare outcomes before, during and after transport, the implementation of current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders<sup>1213</sup> and Regulations<sup>1415</sup>) should be improved to ensure that requirements relating to appropriate transport conditions and fitness to travel of animals are adequately enforced.

**Recommendation 2:** Any legislative improvements to safeguard the welfare of animals during transport must be evidence-based and informed by a welfare outcomes approach.

**Recommendation 3:** Any proposals to improve welfare during transport should consider all forms of transport and address the issue of welfare before, during and after journeys.

**Recommendation 4:** 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.

**Recommendation 5:** 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.

**Recommendation 6:** 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.

<sup>7</sup> [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

<sup>8</sup> [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

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

<sup>10</sup> [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

<sup>11</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.**

<sup>12</sup> [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

<sup>13</sup> [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

<sup>14</sup> [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

<sup>15</sup> [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

**Recommendation 7:** 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](#).

**Recommendation 8:** 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.

**Recommendation 9:** 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.

**Recommendation 10:** 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.

**Recommendation 11:** 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.

**Recommendation 12:** 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 during transport eg. sensors to measure temperature, exact timings and animal welfare indicators.

**Recommendation 13:** Animals should not be exported to countries for non-stun slaughter. BVA is clear in its [view that all animals should be stunned before slaughter to render them insensible to pain](#).

**Recommendation 14:** 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.

**Recommendation 15:** No animal should be 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.

**Recommendation 16:** Consideration should be given to providing more opportunities for farm animal slaughter as close to the point of production as possible with appropriate animal health and welfare safeguards.

# BVA Position on the welfare of livestock during transport

## Introduction

Movement of animals is an intrinsic part of livestock<sup>16</sup> keeping, production and distribution of genetics to provide the stock necessary to feed the rest of the world.<sup>17</sup> The scale will vary widely from local area movements, to pastures, markets, new premises to those of greater distance such as regional, national and long-distance international moves.

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>18192021</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.

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<sup>16</sup> For the purposes of this position statement the term 'livestock' is understood to include food producing animals and equidae.

<sup>17</sup> 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.

In addition, in the poultry sector day-old chicks are able to survive on their yolk sac reserves to support them during the first 72 hours of life.<sup>17</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.

Further, 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.

<sup>18</sup> Defra: Transcontinental road transport of breeder pigs - effects of hot climates

<sup>19</sup> Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

<sup>20</sup> Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

<sup>21</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

BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders<sup>2223</sup> and Regulations<sup>2425</sup>) that are in force to protect the health and welfare of livestock during transport<sup>26</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.

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 as set out below.

## Legal requirements

Facilities, standards and factors to be considered to safeguard the welfare of livestock during transportation are contained in [European Community Regulation 1/2005](#).

Details of the requirements are set out in [Defra's guidance on the implementation of \(EC\) No1/2005 and The Welfare of Animals \(Transport\) \(England\) Order 2006 and parallel national legislation in Scotland, Wales and Northern Ireland](#).

The standards that apply are dependent on journey times, type of movement, who is carrying this out and whether the journey is to another member state/third country. These minimum standards must be met for the entirety of the journey in this country and abroad and apply to all animals being moved under the regulation, no matter the purpose of the export (for example if it is for breeding or fattening), in line with current EU regulation [\(EC\) No 1/2005](#).

These standards also set out that no animal should be transported unless fit enough to complete the entire journey without pain or discomfort. According to [Defra's guidance on the implementation of \(EC\) No1/2005 and The Welfare of Animals \(Transport\) \(England\) Order 2006 and parallel national legislation in Scotland, Wales and Northern Ireland](#), fitness to travel means:

*"[...] that an animal must be fit for the intended journey before the journey starts and must remain sufficiently fit throughout the journey. The animal should be healthy enough to tolerate the entire journey it is about to make (including loading, unloading and any journey breaks) with no or very little adverse effect on it; the journey should not cause the animal any suffering or injury."*

With this in mind, it is illegal to transport animals that are not fit to travel, including:

<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](#)

<sup>26</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.**



- very young animals, eg. calves less than ten days old, pigs less than three weeks and lambs less than one week
- calves less than 14 days old, for journeys over eight hours
- cervine animals in velvet, ie. deer with newly growing antlers
- puppies and kittens less than eight weeks old, unless accompanied by their mother
- new-born mammals where the navel hasn't completely healed
- heavily pregnant females - where more than 90 per cent of the expected gestation period has passed - unless they are being transported for veterinary treatment
- females who have given birth during the previous seven days
- sick or injured animals where moving them would cause additional suffering, unless instructed by a vet
- shorn sheep during cold weather - particularly November to March - see the page in this guide on transporting animals in extreme temperatures<sup>27</sup>

Defra has published species-specific guidance to supplement these general rules, including:

- [Transporting horses and ponies](#)
- [Transporting cattle](#)
- [Transporting pigs](#)
- [Transporting sheep](#)
- [Transporting goats](#)
- [Transporting poultry](#)

Research has indicated that transport conditions and fitness to travel are of greater importance than journey duration in terms of safeguarding the health and welfare of animals during transport.<sup>28293031</sup> As outlined above, current legislation to safeguard animal welfare during transport provides regulatory powers to address transport conditions and animals' fitness to travel. Consideration should therefore be given as to how authorities can better utilise and effectively enforce current legislation.

**Recommendation 1: In order to improve welfare outcomes before, during and after transport, the implementation of current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders<sup>3233</sup> and Regulations<sup>3435</sup>) should be improved to ensure that requirements relating to appropriate transport conditions and fitness to travel of animals are adequately enforced.**

<sup>27</sup> [Defra guidance on the implementation of \(EC\) No1/2005 and The Welfare of Animals \(Transport\) \(England\) Order 2006 and parallel national legislation in Scotland, Wales and Northern Ireland](#)

<sup>28</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>29</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>30</sup> Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. Livestock Handling and Transport: Theories and Applications, p.143

<sup>31</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>32</sup> [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

<sup>33</sup> [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

<sup>34</sup> [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

<sup>35</sup> [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

### An evidence-based, welfare outcomes approach

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.

We support welfare outcome assessments as a tool to drive continuous improvement of animal management and husbandry practices, in turn promoting high animal health and welfare. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare. When applied to the transportation of animals, a welfare outcomes approach will contribute to informed considerations of the advantages and disadvantages of different methods of transport and journeys, assisting producers, policy makers and consumers to consider how well a method of transport, or journey route, is able to holistically meet all of an animal's health and welfare needs.

**Recommendation 2: Any legislative improvements to safeguard the welfare of animals during transport must be evidence-based and informed by a welfare outcomes approach.**

### Improvements to animal welfare during transport

As set out above, BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders<sup>3637</sup> and Regulations<sup>3839</sup>) that are in force to protect the health and welfare of livestock during transport.

Consequently, while we support a ban on live exports for fattening and slaughter, we would like to see wider reform alongside this, as we believe such a ban risks oversimplifying the wider determinants of animal welfare during transport.

**Recommendation 3: Any proposals to improve welfare during transport should consider all forms of transport and address the issue of welfare before, during and after journeys.**

We recognise that animal transport is a legal trade, and integral to agricultural life, this not only includes live exports for slaughter, but exports for fattening, breeding, imports, as well as domestic movements. However, 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

Therefore, any proposals to improve welfare during transport must duly consider how this would work for all of the types of movements, for all UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.

**Recommendation 4: Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and**

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<sup>36</sup> [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

<sup>37</sup> [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

<sup>38</sup> [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

<sup>39</sup> [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

## **the impact of unintended consequences on animal welfare and industry across the UK.**

### **Equidae welfare during transport**

Equidae stand apart from other livestock species in that they are not only transported for breeding, fattening and slaughter<sup>40</sup> but also as companion and competition animals. Consequently, there is a difference in the legislation affecting the transport and inspection of 'registered' horses compared to '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 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.

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. In this sense, the derogation may continue to be used and present a loop hole in terms of safeguarding the welfare of vulnerable registered horses in transport. Consequently, as all horses being transported have the same five welfare needs, there is an opportunity to improve the welfare of vulnerable 'registered' horses who may otherwise be transported under this derogation.

We are, however, aware that the equine industry is supportive of the concept of a High Health Horse (HHH) status within the new EU Animal Health Law and recognises complexities of legislation in this area.

**Recommendation 5: 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.**

### **Multi-factorial determinants of welfare during transport**

It is important to recognise that the wider determinants of welfare associated with transporting animals - whatever the purpose - can often be conflicting, including the unintended welfare consequences of loading, unloading and the provision of inappropriate rest stop facilities. As such, there are multiple factors that should be considered in efforts to improve the welfare of animals in transport and it is important to emphasise that journey length is not the only influencer of welfare conditions for animals during transport.

With this in mind, we recognise that it can often be difficult to meet the 5 welfare needs of animals during transport. These needs, as set out in the UK Animal Welfare Acts, are:

- The need for a suitable environment (place to live)
- The need for a suitable diet.
- The need to be housed with or apart from other animals

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<sup>40</sup> There are currently legislative safeguards in place to prevent the indiscriminate export of horses for slaughter. Read more at [World Horse Welfare: Export of HoQS](#).



- The need to be protected from pain, suffering, injury and disease
- The need to exhibit normal behaviour patterns

Therefore, due consideration should be given as to how to holistically address all determinants of welfare.

**Recommendation 6: 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.**

Considerations should include<sup>41</sup>:

**Transport time and distance from point of production** – To safeguard animal welfare, animals should be slaughtered as close to point of production as possible. Journey times should be planned to ensure that transportation time is as short as possible, with animals not being transported longer than necessary. However, it must be recognised that in some points of the UK, transport is necessary to maintain a thriving trade, sometimes across water to reach the nearest slaughterhouse (eg. Highland and Islands – these distances may not necessarily be far and some longer distances may be travelled by road elsewhere in the UK), across land borders (ie. between Northern Ireland and the Republic of Ireland), between Scotland and England and across mainland UK as a whole (some journeys across mainland UK, for example, may involve journeys of equivalent or more time to those journeys for live exports abroad).

**Transport design, condition and stocking density**– Whilst transporting animals closely together may inhibit natural behaviour and movement, keeping animals close together may also prevent them from falling and potential injuries that would present more of a welfare harm to the animal. However, where it is safe to, animals should be free to hold their own balance. It must be recognised that 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. Requirements will be species specific and outlined within legislation eg. as set out under [\(EC\) No 1/2005](#), equids being transported on journeys of more than 8 hours must be transported in vehicles with individual stalls, except a mare may travel with her foal. Stocking horned and non-horned animals together (eg. horned and non-horned goats) should be avoided so as to avoid the risk of goring. In addition, consideration should be given as to the space allowance needed for animals with ear tags to prevent tearing of ear tags when animals are in close confinement.

Further, all transport vessels must meet the higher specifications required for long distance journeys as set out under [\(EC\) No 1/2005](#) on the protection of animals during transport.

**Recommendation 7: 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**

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<sup>41</sup> EFSA Panel on Animal Health and Welfare (2011) [Scientific Opinion concerning the welfare of animals during transport](#) considers the available evidence for each of these points across farm animals species area in detail.

**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](#).**

**Driver skill, competence and planning** – Drivers must be appropriately trained. Driver skill and competence, particularly during acceleration, braking and cornering can directly impact on the welfare of the animals being transported. In addition, drivers should take care to plan routes so as to avoid road type eg. bumpy, windy or hilly roads directly impacting on animal welfare, whilst ensuring that journey times do not become excessively long.

**Recommendation 8: 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.**

**Watering, feeding intervals and rest periods**– As above, whilst during transport animals need breaks for watering, feeding and rest, 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. It is important that attendants at rest points have a similar responsibility for the animals under their care as hauliers and that they have received appropriate, certified training in animal handling. It is also important that appropriate veterinary care is available to recognise and assess any potential welfare issues, manage any negative welfare outcomes, confirm whether animals to continue on their journeys and ensure the provision of emergency slaughter if needed.

**Recommendation 9: 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.**

**Recommendation 10: 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.**

**Monitoring of health and welfare** – It is important to assess the welfare of animals both pre- and post-transport under the direction of a veterinary surgeon, as well as monitoring the welfare of animals during transport. At present, Official Veterinarians (OVs) already undertake such monitoring post-transport at arrival to slaughterhouses in the UK, for example. Under current legislation for longer journeys, this is also achieved through the assessment of fitness for transport before travel and manual monitoring during intervals and a journey log throughout transport. In addition, automated tracing systems that use parameters and sensors to measure temperature, exact timings and animal-based welfare indicators can be used as an outcomes-based approach to measure animal welfare during transport. Consideration should also be given to the health and welfare risks of control stops eg. risk of disease transmission, compliance with cleansing and disinfection regulations, the effect on zoonotic conditions and the poor welfare implications of loading and unloading.

**Recommendation 11: 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.

**Recommendation 12: 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 during transport eg. sensors to measure temperature, exact timings and animal welfare indicators.**

**End destination standards** – Welfare conditions during transport should not be considered in isolation, a holistic approach should be given to considering the health and welfare conditions both during the transport of animals and standards at their end destination, whether that be for slaughter, fattening or breeding. 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.

**Exporting 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. Further, animals should not be exported for non-stun slaughter, [our view is that all animals should be stunned before slaughter to render them insensible to pain](#).

**Recommendation 13: Animals should not be exported to countries for non-stun slaughter. BVA is clear in its [view that all animals should be stunned before slaughter to render them insensible to pain](#).**

We would like to emphasise that exporting animals for non-stun slaughter is not in the spirit of the current derogation in [Welfare of Animals at the Time of Killing regulations](#) for non-stun slaughter, which is intended to enable the provision of food in accordance with religious rites for specific communities in the UK.

### Exploring opportunities for slaughter as close to the point of production as possible

As a general principle to safeguard animal health and welfare, 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 near to the point of production as possible and should not be transported long distances to the abattoir or other end destination.<sup>42434445</sup>

**Recommendation 14: Wherever possible, and paying due regard to scientific evidence regarding the relationship between journey times and welfare outcomes, animals to**

<sup>42</sup> Defra: Transcontinental road transport of breeder pigs - effects of hot climates

<sup>43</sup> Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

<sup>44</sup> Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

<sup>45</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

**be slaughtered for food should be slaughtered as close to the point of production as possible.**

Protection of animal welfare is subject to national rules as well as EU Regulation/Directives as appropriate. Consequently, animals may be moved from the UK to other destinations where standards are unknown or kept in conditions that may be banned in the UK. Therefore, we are opposed to the exportation of animals to destinations with unknown standards and the exportation of animals into systems that have been banned in the UK due to welfare considerations.

**Recommendation 15: No animal should be knowingly exported to a destination with unknown welfare standards or exported, then raised in systems previously banned in this country due to welfare considerations. Neither should animal product from such animals be re-imported.**

Consideration should be given to providing more opportunities for farm animal slaughter as close to the point of production as possible, in turn reducing the need for animals to be transported over longer distances.

The role of mobile abattoirs should be further explored to create more opportunities for on-farm slaughter of animals destined for human consumption.

Mobile abattoirs would need to comply with current legislative requirements for animal health and welfare at slaughter, biosecurity, food safety and hygiene checks, including ante- and post-mortem inspections performed by Official Veterinarians. In addition, there would be a need for safe lairage facilities, a potable supply of water, facilities for the disposal of animal by-products, as well as suitable facilities for the dressing and movement of carcasses.

Any growth in mobile abattoirs should not represent a downgrading of animal health and welfare or public health standards and we could only support the use of mobile abattoirs where appropriate supervision from Official Veterinarians was in place.

**Recommendation 16: Consideration should be given to providing more opportunities for farm animal slaughter as close to the point of production as possible with appropriate animal health and welfare safeguards.**