22 May 2018

BVA, BVPA, GVS, VP HA, AGV, AND SVS RESPONSE TO DEFRA CALL FOR EVIDENCE ON CONTROLLING LIVE EXPORTS FOR SLAUGHTER AND TO IMPROVE ANIMAL WELFARE DURING TRANSPORT AFTER THE UK LEAVES THE EU

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 17,000 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) To produce this response, we have worked jointly with our regional branches (BVA Scottish Branch, BVA Northern Ireland Branch and BVA Welsh Branch) and the following specialist species divisions:

- 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 **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.

- The **Association of Government Veterinarians (AGV)** is a specialist division of BVA representing the views of veterinarians working in UK Government Departments and Executive.
3) **Introduction**
We welcome the opportunity to contribute to Defra’s call for evidence on controlling live exports for slaughter and recognise that the UK’s exit from the EU provides an opportunity for the UK to improve the welfare of animals that are transported.

4) **Animals to be slaughtered for food should not be transported long distances to the abattoir but should be slaughtered as near to the point of production as possible. We therefore recommend that animals are transported on the hook (as meat) not on the hoof (as live animals).**

5) **Whilst this call for evidence focusses on the control of live exports for slaughter, we are keen that measures to improve animal welfare should address the broader welfare implications of transporting animals and we would caution against oversimplification around this issue with a disproportionate focus on the perception of live export.**

6) **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.**

7) **Any proposal to ban live exports or imports for slaughter must also duly consider how this would work for all of the UK administrations and the impact of unintended consequences on animal welfare and the transportation of animals across the UK, particularly in Scotland and Northern Ireland.**

It is important to recognise the potential unintended consequence on the domestic food production industry of imposing a maximum journey time for live exports for slaughter. We are concerned that the rationale for imposing a maximum journey time would then be extrapolated and applied to the domestic transport of animals, impacting negatively on the food production sector across mainland UK where the transportation of animals may involve journeys of equivalent or more time to those journeys for live exports abroad. For example, the transport of animals from Scotland to the South of England for slaughter or the transport of animals from Wales to the border regions, which is frequently required.

In addition, official [TRACES data of animals traded between EU Member States in 2016](https://ec.europa.eu/food/traces) show that the overwhelming majority of animals exported for slaughter from the UK were transported to the Republic of Ireland. This implies shorter journey times and improved assurance of end destination conditions for the majority of animals exported for slaughter if these animals are slaughtered in the Republic of Ireland and not transported on to continental Europe. With this in mind, there is a need to distinguish and make specific considerations regarding United Kingdom – Republic of Ireland live import and exports, paying particular regard to the potential shorter journey times implied by import/export across the Northern Ireland – Republic of Ireland land border.
Further, the specificity of animal transportation in Scotland’s Highlands and Islands must also be considered within any proposals to ban live export. Due to their geographical isolation from the mainland, it is necessary for producers to transport animals by ferry from remote parts of Scotland to the mainland for processing, these distances may not necessarily be far and some longer distances may be travelled by road elsewhere in the UK. Therefore, any ongoing considerations of live exports and imports must distinguish between transport across the sea for slaughter for those animals within the UK, where there is assurance of end point destination standards and enforcement measures for the transport of animals, and transport for slaughter outside of the UK.

8) We hope that this exercise will enable evidence-based improvements to policies regarding the transport of animals, which both safeguard animal health and welfare and ensure a thriving farming industry across the whole of the UK. With this in mind, we look forward to a detailed consultation that will explore this complex area in more detail.

9) BVA position on transporting animals
Animals to be slaughtered for food should not be transported long distances to the abattoir but should be slaughtered as near to the point of production as possible. Welfare concerns arise when animals are transported to a third country where the true origin and total transport times are not always known. We therefore recommend that animals are transported on the hook (as meat) not on the hoof (as live animals). No animal should be transported unless fit enough to complete the entire journey without pain or discomfort. No animal should be exported and then raised in systems previously banned in this country due to welfare considerations. Neither should the meat from such animals be re-imported.

We are keen that measures should address the issue of welfare both during and after transport in general, rather than placing a disproportionate emphasis on live export due to public perception. 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.

Where export does occur, there should be a well-defined set of animal welfare standards that must be met for the entirety of the journey 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 EU regulation (EC) No 1/2005. There should also be measures in place to ensure that if circumstances change during the journey, for example there are delays or cancellations, there are contingency plans in place to ensure the standard of animal welfare is maintained.

10) Question 2a: What are the key current regulatory requirements that you think protect the welfare needs of animals during transport?
Fundamentally, the UK Animal Welfare Acts provide general protection of animal welfare and underpin the impetus on those transporting animals to meet the five welfare needs of all animals involved. 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
• The need to be protected from pain, suffering, injury and disease
• The need to exhibit normal behaviour patterns

In addition, at a minimum, regulatory requirements as set out in (EC) No 1/2005 on the protection of animals during transport and related operations, as well as the Welfare of Animals (Transport) Order 2006, must be maintained when the UK leaves the EU.

To support compliance with existing regulatory requirements, a consortium consisting of 16 partners, including the Federation of Veterinarians of Europe, has started to develop Guides to Good and Best Practice as a European Commission, DG Sante pilot project. These guides can be accessed at the Animal Transport Guides site.

11) Question 2b: What issues or deficiencies in current regulations are you aware of?

General comments
Whilst rest stops are necessary to safeguard animal health and welfare, they must be undertaken in appropriate environments, with appropriate unloading/loading and handling to avoid unnecessarily causing stress to the animals being transported or increasing the risk of injury. We are concerned that current regulations mean that rest stops and loading/unloading can be undertaken in inappropriate environments, which may add more stress to the animals and increased potential of injury. In addition, in these environments there may not be appropriate veterinary care available to manage injuries or undertake welfare impact assessments should these rest stops result in negative welfare outcomes for the animals that are being transported.

Further, we are concerned as to how current EU regulations are enforced once stock leaves the UK. At present there is no mechanism of assurance or feedback to ensure standards during transport are maintained for the entirety of journeys, as well as at the end destination.

Consideration should also be given to the current disparity between long journey times for the transportation of animals and maximum driving periods and minimum rest periods for road drivers.

In terms of transport vessels, we are concerned that under the present regulations only lorries require specific pre-approval inspections, we would like to see that all vessels used for transporting animals, including roll-on, roll-off ferries and aircraft require pre-approval inspections before being permitted to transport animals.

Movement of horses

In terms of the movement of horses, we are aware that 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 the concept of a High Health Horse (HHH) status within the new EU Animal Heath Law and recognise complexities of legislation in this area.

12) Question 2c: What do you consider are the most important considerations for improving animal health and welfare during the transport of animals or related operations?

There are multiple factors that should be considered in attempts to improve the welfare of animals in transport and it is important to recognise that these can be conflicting. Considerations should include:

**Transport time and distance from point of production** – To safeguard animal welfare, animals should be slaughtered as close to point of production as possible. 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 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.
Stocking horned and non-horned animals together (e.g. 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.

In addition, 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.

Driver skill and competence – 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.

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 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. This can be achieved through manual monitoring during intervals and a journey log or through automated tracing systems that use parameters and sensors to measure temperature, exact timings and animal welfare indicators. Consideration should also be given to the health and welfare risks of control stops eg. risk of disease transmission and the poor welfare implications of loading and unloading.

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.

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. We also understand that World Horse

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Welfare will be providing further evidence as to the welfare of equids during transport in their submission to this call for evidence.

13) **Question 2d:** The current EU regulation requires transporters to reach a higher standard if they are transporting animals on long journeys i.e. more than 8 hours. How do you think we should define long journeys?

Our position is clear in that animals for food production should be slaughtered as close to the point of production as possible. We therefore recommend that animals are transported on the hook (as meat) not on the hoof (as live animals). However, we would caution against focussing on journey time as the primary determinant of welfare compromise during the transport of animals, as this may result in an oversimplification of the breadth of welfare determinants that should be duly considered when looking to improve the welfare of animals during transport. Any definition of long journeys should be informed by a robust evidence base and welfare-outcomes assessments across species areas.

14) **Q2e:** What evidence do you have that journey length influences the welfare conditions for animals?

As above, it is important to emphasise that journey length is not the only influencer of welfare conditions for animals during transport. We recognise that it is 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
- The need to be protected from pain, suffering, injury and disease
- The need to exhibit normal behaviour patterns

As set out in the response to Question 2c, achieving positive welfare conditions during transport can often be conflicting and complex. Therefore, due consideration should be given as to how to address all determinants of welfare compromise, not solely journey length.

We are aware of the following research from Professor Malcolm Mitchell regarding the impact of journey length and environment on welfare conditions:

- Defra: Transcontinental road transport of breeder pigs - effects of hot climates
- Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare
- Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

We are also aware that Scotland’s Rural College (SRUC) is currently undertaking research to examine the welfare outcomes of calves during long distance transport both during transportation and in the weeks following arrival at the end destination. We look forward to receiving the conclusions of this crucial piece of research to ensure that any policy undertaken in this area is evidence-based.

Dr Bernadette Earley at Teagasc, Grange, County Meath has also published widely on welfare during transport.

15) Q2f: On long journeys, the regulation currently requires rest stops to allow the animals to recover before continuing their journey. There is no limit on the number of rest steps nor a maximum journey limit. Do you believe there should be a maximum number of rest stops? Do you believe there should be a maximum journey time?

Animals for food production should be slaughtered as close to the point of production as possible. We therefore recommend that animals are transported on the hook (as meat) not on the hoof (as live animals).

In terms of rest stops, watering, feeding intervals and rest periods are necessary to ensure that animals are hydrated, fed and rested throughout the journey, however how these are undertaken depends on species type. Consideration should be given to the potential unintended welfare consequences of too many rest stops, and the welfare implications of poor handling, unloading and loading that may cause additional stress or injury, without appropriate veterinary care available to manage any negative welfare outcome.

Any specified maximum number of rest stops or a maximum journey limit must be informed by robust evidence that considers the species-specific welfare outcomes of rest periods. As above, we are aware that Scotland’s Rural College (SRUC) is currently undertaking research to examine the welfare outcomes of calves during long distance transport both during transportation and in the weeks following arrival at the end destination. We look forward to receiving the conclusions of this crucial piece of research.

As previously outlined, we believe focussing solely on journey time is an oversimplification of the wider determinants of welfare in the transport of animals. It is also important to recognise the potential unintended consequence on the domestic food production industry of imposing a maximum journey time for live exports for slaughter. We are concerned that the rationale for imposing a maximum journey time would then be extrapolated and applied to the domestic transport of animals, impacting negatively on the food production sector across mainland UK where the transportation of animals may involve journeys of equivalent or more time to those journeys for live exports abroad. For example, the transport of animals from Scotland to the South of England for slaughter or the transport of animals from Wales to the border regions of Scotland, which is frequently required.

16) Q2g: What evidence do you have on how the different forms of transport affect animal welfare?
As outlined above, in all forms of transport of animals it is difficult to ensure that their five welfare needs are met. 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
- The need to be protected from pain, suffering, injury and disease
- The need to exhibit normal behaviour patterns

EFSA Panel on Animal Health and Welfare (2011) Scientific Opinion concerning the welfare of animals during transport considers the available evidence regarding the welfare of animals during transport across farm animal species.

17) Do you have any evidence on the transport of unweaned animals? What age-related conditions do you think should apply?
We would not support the transport of animals that are still dependent on their mothers and would be strongly against exporting young animals into systems that have standards below the UK minimum or exported and then raised in systems previously banned in this country.

18) Q2i: What conditions do you think should apply to animals post transport? Please indicate which species you are referring to?
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. 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.

19) Q2j: How do you think fitness to travel should be defined?
Animals should be fit enough to complete the entire journey without pain or discomfort. BVA supports the requirements defining for ‘Fitness for Transport’ as set out in EU regulation (EC) No 1/2005 on the protection of animals during transport and related operations. As 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, fitness to travel means:

“[…] 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.”

Upon leaving the EU, any fitness to travel requirements should meet (EC) No 1/2005 at a minimum.
Q3a: Does the journey end point ie. slaughter or production facility influence animal welfare?

Equal consideration should be given to transport and journey end point standards in terms of how they impact on animal welfare. As outlined above, 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. Again, 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.

Further, whilst this call for evidence only considers live export for slaughter, consideration should be given to improving the welfare conditions of all transport of animals, whether live export for slaughter, fattening and breeding, as well as imports. There should be a well-defined set of animal welfare standards that must be met for entirety of the journey 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 EU regulation (EC) No 1/2005. There should also be measures in place to ensure that if circumstances change during the journey, for example there are delays or cancellations, there are contingency plans in place to ensure the standard of animal welfare is maintained. Consideration should also be given to how welfare standards will be enforced once animals have left the UK.

Q3b: Do you think that ban on live exports, or imports should apply? If so, for what purpose ie. slaughter, production.

We consider that banning live exports risks oversimplifying the wider determinants of animal welfare involved in the transportation of all animals, placing a disproportionate emphasis on live export due to public perception. If live export were to be banned, the rationale for implementing a ban would logically then have to be extended to imports, domestic transport and exporting for fattening (production) or breeding.

Oversimplification of live export for rearing, slaughter and breeding in the poultry sector

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. 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.

doi: 10.3184/175815509X431894
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. Consideration must be given as to how a potential ban on live exports would impact on this valuable area of food production – valuable both in terms of production and in terms of human and animal health.

**Northern Ireland and Scotland**

Any proposal to ban live exports or imports must duly consider how this would work for all of the UK administrations and the impact of unintended consequences on industry and animal welfare in Scotland and Northern Ireland.

For 2016, official figures show that the overwhelming majority of animals exported for slaughter from the United Kingdom were transported to the Republic of Ireland. This implies shorter journey times and improved assurance of end destination conditions for the majority of animals exported for slaughter if these animals are slaughtered in the Republic of Ireland and not transported on. Figure 1 demonstrates that across species areas in 2016, exports for slaughter from the United Kingdom to the Republic of Ireland constituted the whole or overwhelming majority of total animals exported for slaughter to EU Member States.

**Figure 1: Taken from published data from TRACES data - Animals traded between Member States in 2016**

<table>
<thead>
<tr>
<th>Species exported for slaughter between EU Member States in 2016</th>
<th>Total number of animals exported for slaughter from the UK to the Republic of Ireland in 2016</th>
<th>Total number of animals exported for slaughter from the UK to EU Member States in 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cattle</td>
<td>10,464</td>
<td>10,464</td>
</tr>
<tr>
<td>Pigs</td>
<td>8,916</td>
<td>8,916</td>
</tr>
<tr>
<td>Sheep</td>
<td>380,909</td>
<td>385,099</td>
</tr>
<tr>
<td>Goats</td>
<td>171</td>
<td>171</td>
</tr>
</tbody>
</table>

Overall, these figures indicate that only **4,190 animals out of 404,650** animals in total were exported directly to mainland Europe for slaughter in 2016.

With this in mind, there is a need to distinguish and make specific considerations regarding United Kingdom – Republic of Ireland live import and exports, paying particular regard to the potential shorter journey times implied by import/export across the Northern Ireland – Republic of Ireland land border. However, consideration must also be given to the potential welfare compromise of animals that are exported across the Northern Ireland/Republic of Ireland border and then transported from the Republic of Ireland across into mainland Europe where it is harder to assess that destination conditions (as per EU regulations) are being complied with.

Further, the specificity of animal transportation in Scotland’s Highlands and Islands must also be considered within any proposals to ban live export. Due to their geographical
isolation from the mainland, it is necessary for producers to transport animals by ferry from remote parts of Scotland to the mainland for processing, these distances may not necessarily be far and some longer distances may be travelled by road elsewhere in the UK. Therefore, any ongoing considerations of live exports and imports must distinguish between transport across sea for slaughter for those animals within the UK, where end point destination standards and enforcement measures for the transport of animals are known, and transport for slaughter outside of the UK.

22) Q3c: Do you think all transporters should be inspected and approved?

At present, EU Regulation (EC) No 1/2005 applies to economic activity so that the detailed requirements do not on the face of it apply to non-economic movements. However, a general provision exists not to cause harm in transporting any warm-blooded animal. We would strongly support that this general requirement is bolstered in future controls to remove this potential grey area and make all journeys subject to more detailed requirements to safeguard animal welfare.

We strongly support that all transporters must be inspected and approved, regardless of method of transport. Consideration could also be given to developing a live export and import assurance scheme to ensure high welfare standards, enforcement, appropriate assessments with veterinary input and continuous improvement of the transport, handling and loading/unloading of animals based on a welfare outcome safeguards approach.

23) Q3d: What other factors should be considered and addressed to improve the welfare of animals during transport?

As outlined throughout this response, improving the welfare of animals during transport requires the consideration of complex and sometimes conflicting factors, see full response to question 2c. We would welcome further thought on how best to safeguard animals from any potential welfare compromise involved in the handling, loading and unloading of animals during rest stops.

Further, we would support additional consideration as to how to improve the monitoring and enforcement of current live export and animal movement legislation. This is particularly pertinent in the movement of horses, as while there have been no declarations of horses being exported for slaughter for many years it is highly questionable that this truly reflects the reality of the situation. This is because horses and ponies are exported for a variety of reasons and there is no way to guarantee that a horse declared as being exported for riding will not be sold at a market for meat. Until there is full traceability within and outside of the UK it is a challenge to truly know end destinations for exported horses. In the meantime, checks at the border and point of origin are necessary to ensure compliance. Once we leave the EU there is an opportunity to introduce checks on equines as a matter of course, or spot checks, which is not currently possible under EU rules. Increased checks will help prevent this non-compliant movement of equines, including ensuring that only equids that are fit for their intended journey are being transported.
With this in mind, we recognise the resource constraints currently faced by local authorities when endeavouring to effectively enforce animal movement legislation and enact their statutory duty as set out in the UK Animal Welfare Acts (2006). We would therefore welcome increased, ring-fenced, funding for local authorities to effectively enforce animal welfare-related issues, including live export and animal movement legislation.

Consideration could also be given to developing a live export and import assurance scheme to ensure high welfare standards, enforcement, appropriate assessments with veterinary input and continuous improvement of the transport, handling and loading/unloading of animals based on a welfare outcomes approach.

As all animals should be slaughtered as close to the point of production as possible, thought could be given to the improved provision of local abattoirs, with appropriate veterinary input and supervision from Official Veterinarians, to ensure a single high standard that avoids the opportunity for food fraud and continues to guarantee public health and animal health and welfare standards.

24) Concluding remarks
Fundamentally, animals should be slaughtered as close to point of production as possible. We therefore recommend that animals are transported on the hook (as meat) not on the hoof (as live animals). No animal should be transported unless fit enough to complete the entire journey without pain or discomfort.

However, we consider that banning live exports risks oversimplifying the wider determinants of animal welfare involved in the transportation of all animals, placing a disproportionate emphasis on live export.

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.

Any proposal to ban live exports or imports must duly consider how this would work for all of the UK administrations and the impact of unintended consequences on industry and animal welfare in Scotland and Northern Ireland.

With this in mind, we are keen that measures should address the issue of transporting all animals in general. 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.

If export does have to occur there should be a well-defined set of animal welfare standards that must be met for the entirety of the journey 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 EU regulation (EC) No 1/2005. There should also be measures in place to ensure that if circumstances change during the journey, for example there are delays or cancellations, there are contingency plans in place to ensure the standard of animal welfare is maintained.
Ultimately, we hope that the results of this call for evidence will enable evidence-based improvements to policies regarding the transport of animals, which both safeguard animal health and welfare and ensure a thriving farming industry across the whole of the UK. We look forward to a detailed consultation that will explore this complex area in more detail.