



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

- 1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) We have developed our response in consultation with BVA Welsh Branch and our species and sector-specific divisions, including:

The **Association of Government Veterinarians (AGV)** is a specialist division of BVA representing the views of veterinarians working in UK Government Departments and Executive, Agencies or principally engaged in the delivery of services for any UK Government Department or their Executive Agencies.

The **British Equine Veterinary Association (BEVA)** serves and leads the equine veterinary profession in the championing of high standards of equine health and welfare and the promotion of scientific excellence and education. BEVA represents some 3,750 members.

The **British Veterinary Poultry Association (BVPA)** is an active non-territorial division of the British Veterinary Association. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.

The **Goat Veterinary Society (GVS)** is a division of BVA and has approximately 300 members, including veterinary surgeons with a specific interest in goat health and welfare, 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.

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

0.5% of dairy calves born in 2014.¹⁶ This decrease is largely due to improved opportunities in the UK for rearing high-welfare veal and beef and the closure of overseas markets.

16) Consideration should therefore be given to the fact that banning live export for slaughter and fattening could result in increased killing of unwanted dairy bull calves, who without a viable market in the UK, may be killed at a young age, shortly after birth. Given the relatively small numbers of abattoirs that accept dairy bull calves and the small UK market for veal, it is likely that these animals would be killed on-farm soon after birth, with an appropriate firearm, or by chemical injection by a veterinary surgeon.

farmers to move away from euthanasia of dairy bred bull calves by 2023 as set out in the [AHDB GB Dairy Calf Strategy 2020-2023](#).

17) Provided killing is carried out humanely, this does not present welfare harm to dairy bull calves per se. However, it can be contentious amongst the wider public to kill healthy young animals, raising ethical issues surrounding the denial of potentially positive experiences that could have been available to the young animal. It may also pose risks to animal welfare depending on the method of killing and the treatment of the animal before it is killed. Without a specific intended use of the carcass, the routine killing of healthy animals also constitutes wastage, which is not in line with the principle of sustainable animal agriculture. For an animal agriculture system to be regarded as sustainable, it should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need.

18) In this context, where the export of dairy bull calves is undertaken in compliance with current legislative requirements to safeguard welfare in transport, and into systems with equivalent welfare standards to the UK, this can present an ethically justifiable and sustainable alternative to killing dairy bull calves shortly after birth.

19) [Read our full position on surplus male animals](#), which advocates that the dairy and egg industries

o first minimise the number of surplus males being produced

(denial of pot-12(s5s)-28b53t-12(s5s)-28b53t-12(s5s)12(t)-15(h)3>150057J JETQD.000008869 0 595.2 841.8 reV

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

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

- 24) While we support _____ s overall policy objectives to end excessively long journeys for slaughter and fattening and ensure slaughter as close to the point of production as possible, we are concerned that the proposal to ban live exports for slaughter and fattening is not an effective mechanism to deliver these outcomes.
- 25) Further details required on enforcement
Further detail is required as to how this proposal would be effectively enforced to ensure that there are no legislative loopholes. For example:
What evidence would be required to prove that the consignment is being exported for breeding purposes and not slaughter or fattening?
How would enforcement authorities verify that animals are being exported for their intended purpose once they have left England and Wales?
How would enforcement authorities verify that a consignment has not been slaughtered within the 6-month time frame once it has left the UK?
What happens to animals that are exported for breeding and are subsequently identified as unsuitable or develop an injury or illness that requires them to be culled and would be fit for slaughter for human consumption?
- 26) In this context, we are also concerned that if vets were expected to certify that animals were being exported for breeding or longer production, this proposal would put unrealistic demands on the certifying vet. As highlighted in the [RCVS 10 principles of certification](#):
- A veterinarian should certify only those matters which:*
- a) are within his or her own knowledge;*
 - b) can be ascertained by him or her personally;*
 - c) are the subject of supporting evidence from an authorised veterinarian who has personal knowledge of the matters in question; or*
 - d) are the subject of checks carried out by an Officially Authorised Person (OAP)*
- 27) Effective enforcement of these proposals is particularly pertinent given that the 2019 FAWC opinion on the welfare of animals during transport identified that lack of consistent enforcement and policing was one of the key barriers to the successful implementation of the existing animal transport regulations to safeguard welfare.¹⁸ Consideration should be given to how the enforcement of welfare in transport regulations could be better aligned between local authorities and APHA to ensure improved collaboration and consistent safeguarding of animal welfare.
- 28) Impact on movements in other parts of the UK
Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.

¹⁸ 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->

- 29) While we recognise that these proposals will not impact domestic movements of livestock within the UK, we are concerned that if a unified UK-wide approach is not agreed upon, banning exports for slaughter and fattening that leave from, or pass through, England and Wales could result in unintended consequences for the welfare of livestock exported from Scotland and Northern Ireland.
- 30) The 2019 FAWC opinion highlighted that recent evidence showing that the motion at sea can cause increased stress in sheep and pigs, and that due to a lack of research it is not yet possible to determine maximum acceptable journey duration by sea.¹⁹

distance) in terms of safeguarding the health and welfare of animals during transport.^{26,27,28,29}

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

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

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

²⁶ 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.

²⁷ 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.

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

²⁹ 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.

³⁰ 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/>

³¹ 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

- 48) It is also important to recognise that evidence suggests transport conditions (eg. driver competence and vehicle design) and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.^{35,36,37,38}
- 49) FAWC acknowledges its recommendations for maximum journey times are made based on the best available evidence, and that further research is required to address species-specific and subgroup-specific knowledge gaps to determine appropriate maximum journey times, temperature ranges and optimum rest periods. Government should commission this research to further enable evidence-based refinement of these proposals in the future.
- 50) Concerns around proposed maximum journey time for broilers
W
hours (including loading and unloading)

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

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

57) Recently hatched chicks

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

58) Mechanisms to take into account exceptional circumstances

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

59) Recently, due to issues in the provis

BVA,

77) W

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.^{47,48,49,50}

Sea transport

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

99) We agree with this proposal in principle, however there would need to be clearly defined contingency plans in place to ensure provision of appropriate temporary accommodation for

outcomes.

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

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