



A strong voice for vets



slaughtered as close to the point of production as possible. <sup>1234</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.

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

- 14) No animal should be exported and then raised in systems previously banned in this country or exported for non-stun slaughter. Animals should not be exported into systems that have standards below the UK minimum or exported and then raised in systems previously banned in this country.
- 15) It is paramount that the UK governments take a holistic approach when considering additional controls on live animal export, including the wider determinants of welfare before, during and after transport, whether that be for slaughter, fattening or breeding.
- 16) We recognise that [redacted] proposal would provide a mechanism to control, and potentially reduce, the number of live export journeys. However, we are concerned that, if implemented, this policy would result in delegation of decision-making to APHA vets, requiring them to navigate complex and potentially conflicting considerations on aspects of welfare, ethics and economics and placing a disproportionate burden on the individual officer. If implemented, this proposal would therefore require clear guidance to support decision-making. There would also need to be a regular report to Scottish ministers so that Ministers could retain oversight; the report should also provide evidence of regulatory controls on transport and production in exported countries.
- 17) Equally, we do not support a ban on live exports. Such a ban would oversimplify the full picture of animal welfare that must be taken into account when considering improvements to animal welfare during transport. It is important to emphasise that with regard to a proposed ban on live exports, AGV and BCVA would support such a ban, with emphasis being put on work to mitigate the risks to welfare that could emerge as a consequence.
- 18) Evidence also suggests that transport conditions and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.<sup>11,12,13,14</sup> Consequently, proposals to improve animal welfare during transport should not disproportionately focus on journey length, and holistically explore improvements to the wider determinants of welfare during transport.
- 19) Specific consideration for live exports of poultry  
If this proposal is progressed, poultry live exports for slaughter, further production and breeding should be exempted. It is important to recognise that the UK is a centre of excellence in respect of poultry





distance) in terms of safeguarding the health and welfare of animals during transport.<sup>24,25,26,27</sup>

- 33) In addition, larger, high-throughput abattoirs may present health and welfare advantages throughout the slaughter process. These advantages may include more defined roles and responsibilities for staff, standardisation of processes, up-to-date staff training, internal and external audit to meet retailer and quality assurance scheme requirements, suitable handling facilities, and additional resources to invest

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

Transport without the requirement for a Journey Log.

Transport without being restricted by water and feed intervals, journey times, and rest periods as set for unregistered horses and ponies.

Transport of animals of four months or younger without being accompanied by their dam.

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

41) Regardless of their classification, all horses being transported have the same welfare needs that

horses, and therefore may not be afforded an adequate level of care, should be protected.

Consequently, we

registered and unregistered horses in future legislation on welfare during transport.

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may spend at market and proposed course of action? Please provide any further relevant information.

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to animals at market should be considered, including the maximum time at market, and that this could specifically set out the case for a new animal welfare licensing regime to be introduced for markets.

47) Given that animal welfare in transport regulations set maximum journey times, with additional at they should also consider setting a maximum time an animal can spend at market. In addition, the Scottish Government should consider measures to ensure the provision of appropriate feed and water for livestock at markets.

48) Any review should also consider the training of those involved in handling animals at market, facility design, access for livestock to food, water, and appropriate bedding, contingency plans should time at market exceed the recommended maximum, as well as the improved use of technology during handling operations to provide more opportunities to verify and observe handling practices. For example, CCTV on lorries for loading and unloading, and at markets and collection centres, as well as body cameras on animal handlers at markets and collection centres.

49) It is also important to recognise that a maximum time at market may have the unintended consequence of reducing rest times, and therefore compromising welfare. In addition, in terms of biosecurity and disease control, it is important to consider that the longer livestock are in markets, the greater likelihood there is of disease spread to, and from, other livestock. This may also result in less opportunity for cleansing and disinfection, as well as fallow periods.

50) There also needs to be very clear guidance as to how time in markets affects official journey times. The impact on welfare of animals at markets can be considerable and will depend greatly on what opportunities there are for livestock to rest, eat and drink, as well as impact of loading and unloading. If there are no opportunities to rest at the market or have access to water, the time in the market should be considered as part of the journey time.

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in transport and proposed course of action? Please provide any further relevant information

51) We recognise that space allowances and stocking density are an important determinant of welfare during transport. Space allowance will have an impact on temperature and humidity, consideration must therefore also be given as to how to achieve a space allowance that will mitigate against negative welfare outcomes and balances this against potential negative effects on the transport environment in which animals are travelling. We support the Scottish

52) Both FAWC and EFSA<sup>34</sup> have supported the use of allometric principles to calculate space

- 54) For horses in particular, we recommend that there should also be at least 10cm on either side of animals to partitions, with space of at least 15 cm at front and back as horses must be able to lower their heads to prevent the development of respiratory issues.
- 55) SVS highlight that guidance on the height of the space which should be provided above a sheep's head during transit will depend on the animal's predominant head position while in the lorry and may be better defined from a fixed, rather than moving, point on the sheep, for example, the shoulder. More evidence may be needed before headroom requirements for sheep can be s





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

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

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

**79)** Recently, due to issues in the provision of abattoir facilities due to Covid-19 and shortages in the supply of carbon dioxide to ensure the effective stunning of poultry, it has been necessary to transport broilers for longer than 4 hours in order to access the nearest abattoir with appropriate facilities and staff. Failure to transport broilers would have resulted in very high welfare risks to birds on-farm due to overstocking.

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

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

**82)** As part of this, there should be Standard Operating Procedures (SOPs) in place to state what contingency action will be taken by transporters in these circumstances to ensure welfare is maintained. This would enable enforcement officers to use this to assess whether transporters have complied with the SOP and taken all required measures to safeguard welfare. Contingency plans should be kept under periodic review and updated in the light of experience when enacted due to exceptional circumstances.

**83)** The welfare of animals pre-, during and post-transportation should be monitored under the direction of a veterinary surgeon in order to manage any potential negative welfare outcomes. Further consideration should be given to implementing outcomes-based approaches to measure and record animal welfare before, during and after transport eg. sensors to measure temperature, exact timings and animal welfare indicators. This may require retro-fitting transporters with appropriate monitoring systems or thermo-regulation systems. Government would need to determine appropriate lead-in times and funding to support industry to comply with any requirements of this kind.

**) 1 -journey breaks and proposed course of action? Please provide any further relevant information.**

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

**85)** We agree that rest periods are a key determinant of welfare during transport, and that these should be considered alongside changes to maximum journey times. In determining appropriate rest periods, consideration must also be given to where animals would be housed during these rest periods and what mechanisms would need to be in place to ensure that animal welfare standards are maintained and can be verified during this period eg, appropriate environment/housing, bedding, access to food and water. In addition, it is important to recognise that while rest periods are important for welfare, appropriate handling is necessary from trained persons to ensure standards of care are maintained and rest intervals do not cause unnecessary stress to the animals and result in increased risk of injury from loading or unloading. Consideration should also be given to how time at

- 86) Attendants at rest points should have similar responsibility for the animals under their care as hauliers and should have received appropriate certified training in animal handling. Appropriate veterinary care must also be available at rest points in order to recognise and assess any potential welfare issues, manage any negative welfare outcomes and ensure the provision of emergency slaughter if needed.
- 87) Off-loading and lairage for rest stops may not only increase stress for transported animals but can also increase biosecurity risk. It is therefore important that any control posts or collection centres have appropriate regulatory controls to both safeguard welfare and mitigate any animal disease risk.

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

- 88) Evidence suggests transport conditions (eg. driver competence and vehicle design) and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.<sup>41,42,43,44</sup> Therefore, regardless of journey length, our view is that:  
All drivers and farmers intending to transport livestock in connection with an economic activity should receive certified training (as is already required of hauliers), with sound knowledge of how aspects of driving can directly impact on the welfare of animals being transported.  
All drivers and farmers intending to transport livestock in connection with an economic activity should receive certified training on the factors that make an animal fit or unfit for transport.
- 89) We would also recommend that there should be greater regulatory oversight of the transport practices involved in the commercial transport of companion animals (as opposed to the non-commercial transport of pets). However, careful consideration would be required when

being delayed/cancelled due to poor weather conditions. As part of this, consideration should be given to who would be responsible for providing this accommodation, how welfare standards will be met and verified, maximum duration of time permitted in temporary accommodation, and the impact of loading and unloading into temporary accommodation on the animals being transported.

- 93) Further consideration should be given to the regulatory impact of this wider proposal and resource required for effective implementation. In addition, it is important to consider how future proposals would

