

BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Order



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.

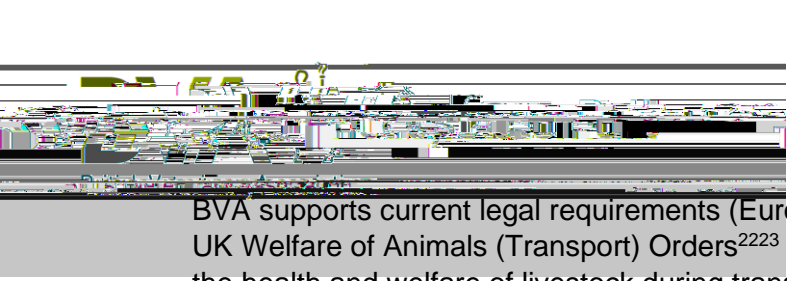
Recommendation 13: Animals should not be exported to countries for non-



BVA Position on the welfare of livestock during transport

Introduction

Movement of animals is an intrinsic part of livestock¹⁶ keeping, production and distribution of genetics to provide the stock necessary to feed the rest of the world.¹⁷ 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.



BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders²²²³ and Regulations²⁴²⁵) that are in force to protect the health and welfare of livestock during transport²⁶. 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.

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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 [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 [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:



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

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

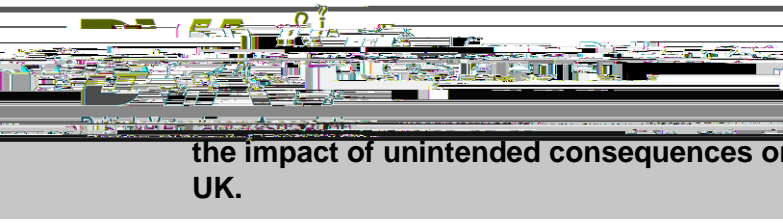
Improvements to animal welfare during transport

As set out above, BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders³⁶³⁷ and Regulations³⁸³⁹) 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, a



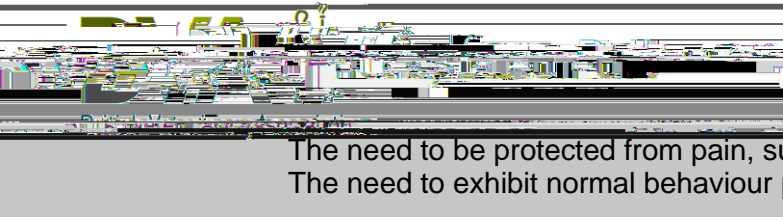
the impact of unintended consequences on animal welfare and industry across the UK.

Equidae welfare during transport

Equidae stand apart from other livestock species in that they are not only transported for breeding, fattening and slaughter⁴⁰ 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.



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 include⁴¹:

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 t



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.

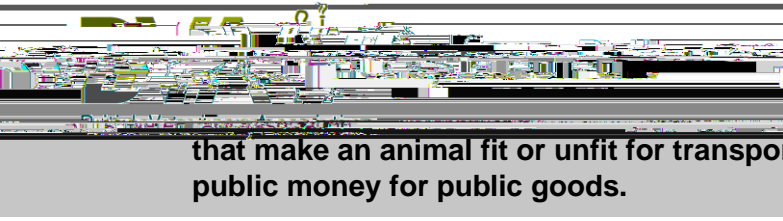
Watering, feeding intervals and rest periods As above, whilst during transport animals need breaks for watering, feeding and rest, appropriate handling is necessary from trained persons to ensure standards of care are maintained and rest intervals do not cause unnecessary stress to the animals and result 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.

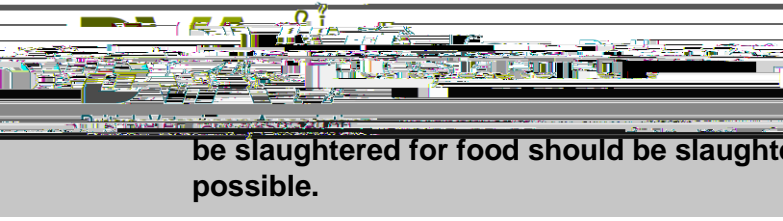
Recommendation 12: The welfare of animals pre-, during and post-transportation should be monitored under the direction of a veterinary surgeon in order to manage any potential negative welfare outcomes. Further consideration should be given to implementing outcomes-based approaches to measure animal 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 K TJETQq0.0ge2 end des3\(al\)6\(s \)-4\(f\)-4\(o\)1](#)



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.

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