



Texel Sheep Society response to DEFRA consultation on improvements to animal welfare in transport

Q1: Do you agree that livestock and horse export journeys for slaughter and fattening are unnecessary? Please explain your views.

Unfortunately, due to the significant contraction and amalgamation in the UK's abattoir sector which has taken place over the last 20 years, there is insufficient abattoir capacity in certain areas of the UK to meet the needs of animal keepers in those areas. In these places it is often the case that export journeys via the short crossing of the English Channel are the quickest and most direct route to slaughter for some livestock.

From 01/01/21 the movement of stock from South West Scotland to Northern Ireland (UK) is now deemed an export.

While, in a perfect world these export journeys would be unnecessary, that is not the case in the UK and unless sufficient abattoir capacity can be encouraged in the southern counties of the UK then these export journeys, properly regulated and planned, will remain the most welfare friendly route to slaughter for some livestock.

GB is an island, UK government have to consider that the closest route to slaughter may in fact be across international boundaries.

Q2: 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? Please explain your views.

As explained above the banning of these journeys could in fact create greater welfare problems than it solves, with animals having to endure longer road transport journeys within the UK than that which is currently taking place via export. The focus should not be on banning exports but ensuring acceptable transport rules are in place to support the animals welfare.

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.

Exports of animals for breeding and/or production are an essential part of EU and global trade in livestock genetics and have added value to many UK farm businesses and those that have gained access to the UK's world class breeding stock, throughout history and particularly in recent years. It is vital these journeys are allowed to continue to ensure UK livestock producers can continue to



maximise the value of their livestock and allow the UK's high value and high productivity genetics to continue to influence EU and global livestock production.

Q4: What would be the financial impact to your business or organisation of no longer being able to export livestock or horses for slaughter or fattening? Please explain any impacts provided.

N/A

Q5: What alternatives would your business or organisation explore if it was not able to export livestock or horses for slaughter or fattening?

The export of semen and embryos (germplasm) is a well-recognised and practiced alternative, but in many cases the success rate with exported embryos in particular is low and buyers prefer to source live animals to maximise the potential in the genetics they are sourcing. Additionally, while the collection of germplasm may assist in meeting intra country sanitary conditions, as opposed to livestock, but to do so means the animals have to go through other procedures and collection procedures, which may be more challenging to the animal than livestock export.

Q6: Do you agree with the proposed maximum journey times as outlined in Table 1? Please explain your views and highlight any potential regional impacts that your business or organisation might experience.

As explained in previous answers, the disparate nature of the modern abattoir sector within the UK and the restrictive and limiting contracts between processors and retailers often makes long journeys for slaughter stock a necessity.

While no one wishes to see animals travel for longer than necessary, well-regulated journeys undertaken by appropriately qualified hauliers with suitable transport as currently occur on a daily basis within the UK do not pose a significant problem to animal welfare.

For many of the islands in some parts of the UK, notably the Shetland and Orkney islands, longer journeys are a vital part of trading as there isn't sufficient suitable abattoir capacity to allow animals to be slaughtered closer to their source.

Additionally, many animals from more remote locations in the UK require transport to other locations for further finishing or for breeding purposes and in some instances these journeys are at or above the proposed limits.

The focus should not be on reducing journey limits, but on ensuring greater abattoir capacity nearer to stock rearing areas. Restricting trade through journey limits could have a significant negative impact on many rural communities and the fabric of rural Britain.

The maximum journey times outlined are unfeasible and unsuitable.



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

There may well be a need for exceptions as outlined above when animals have to be transported from remote locations and conditions mean journeys have to be extended either due to inclement weather or due to issues related to transport itself, such as delays on the road network.

Q8: In the case of such exceptions, what requirements should be put in place to ensure animal welfare is protected?

These exceptions should be notified to APHA as soon as it becomes apparent that they will be necessary and animals should be given sufficient rest time on arrival at their destination.

Q9: What would be the financial impact to your business or organisation due to new maximum journey times being implemented? Please explain any impacts provided.

N/A

Q10: Including loading, unloading and stops, how long is your average journey for the livestock, poultry or horses that your business or organisation manage?

N/A

Q11: Do you agree that a new journey should not start until a minimum of 48 hours have elapsed after the previous journey? Please explain your views.

There are instances where this would be appropriate, but in many cases it may be better to have a shorter wait time and to allow the animals to reach their final destination more quickly. Staggering the journey could create greater problems than it solves and allowing animals to reach their final destination more quickly is often better for their welfare.

Q12: Do you agree that there should be a minimum 7-day rest period for cattle? Please explain your views.

N/A

Q13: Do you agree that we should prohibit both short and long poultry journeys when the external temperature is outside of a temperature range of 5-25oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the journey by means of a thermo-regulation system, and that this temperature range should be 5-25oC? Please explain your views.

N/A



Q14: What would be the financial impact to your business or organisation of prohibiting both short and long poultry journeys when the external temperature range is outside of 5-25oC? Please explain any impacts provided.

N/A

Q15: Do you agree that we should prohibit both short and long livestock and horse journeys when the external temperature is outside of a temperature range of 5-30oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the journey by means of a thermo-regulation system, and that this temperature range should be 5-30oC? Please explain your views.

There is no need to prohibit livestock journeys based on minimum temperatures. Livestock are more often than not outside during the very best and worst of the UK weather and have been bred over generations to withstand the worst it can throw at them. Transport offers no greater welfare risk at temperatures below 5C than it does above 5C, if the vehicle transporting the livestock has sufficient wind shielding to prevent wind chill. Such a move would potentially significantly limit the ability of farmers to trade for periods of the winter months with no logical justification. The UK climate can be extremely different from region to region and within a region during a 24hr period, with fluctuations of more than 10C.

With regard maximum temperatures livestock often experience better welfare during transport as ventilation via air movement allows them to more easily regulate their temperature than would be possible in their natural environment.

Imposing these limits without flexibility due to the diverse climate and irregular transport route times would unfairly disadvantage farmers in parts of the UK more prone to temperatures at the extreme of these limits, placing them at a competitive disadvantage to their counterparts in other areas. For example, it is highly unlikely temperatures in the north of England will exceed 30C on a regular basis, but in the south of England this is much more likely to be the case. Imposing this regulation would mean farmers in some parts of the country could trade while others could not, placing businesses in jeopardy and, potentially, causing greater welfare problems than it solves.

Conversely, there is more likelihood of minimum temperatures being below 5C for sustained periods in the northern parts of the UK than in the south, resulting in the same competitive disadvantage in reverse as that outlined above.

Q16: What would be the financial impact to your business or organisation of prohibiting both short and long livestock and horse journeys when the external temperature range is outside of 5-30oC? Please explain any impacts provided.

N/A



Q17: Do you think that there are other species that should be considered as vulnerable and have a smaller external temperature range applied, outside of which journeys cannot take place? Please provide evidence.

N/A

Q18: What proportion of your current transportation vehicles have the facility to regulate temperature and provide ventilation?

N/A

Q19: For your vehicles which do not have the facility to regulate temperature and provide ventilation, what would be the cost of retrofitting to enable them to regulate temperature and provide ventilation?

N/A

Q20: Are there any other steps that can be taken to ensure animal welfare can be maintained in extreme weather? Please provide evidence.

Many livestock keepers and hauliers already take action to maximise welfare in extreme weather, particularly in hotter temperatures, choosing to transport livestock during the night when temperatures are generally lower than during the daytime and traffic is lighter, allowing journeys to be completed in a timelier fashion and helping ensure sufficient ventilation is enabled within the transport vehicle.

Some commercial transport companies have already invested in ventilated and air-conditioned livestock vehicles, this is less affordable or practical for livestock owners who transport over shorter distances and with smaller numbers of livestock.

Q21: Do you agree that we should use allometric principles as a basis for future space allowance calculations? Please explain your views.

There is a degree of logic behind this principle and, provided the space allowances calculated as a result do not result in either inefficiencies within the transport sector or greater welfare problems due to low stocking within vehicles and the issues that causes then there is no reason not to proceed on that basis.

Q22: Do you think that reforms to space allowances based on allometric principles should apply to both short and long journeys? Please explain your views.

Space allowances should be applied universally, although arguably the space limits imposed on journeys of different length need to be considered in the wider context of the journey being



undertaken, including the economic impact of changing space allowances and the impact that has on the number of animals a vehicle is able to carry.

Q23: Do you agree with the proposed species-specific headroom requirements? Please explain your views.

These headroom limits are significantly higher than those recommended at the present time. As a result, changes to these requirements could significantly impact on the transport sector and require alterations to vehicles. Without evidence that current headroom limits are impacting on animal welfare there is no justifiable reason to implement these proposed headroom limits.

Q24: Do you think that the proposed species-specific headroom requirements should apply to both short and long journeys? Please explain your views.

Headroom limits should be applied universally, although arguably the headroom limits imposed on journeys of different length need to be considered in the wider context of the journey being undertaken, including the economic impact of changing headroom allowances and the impact that has on the number of animals a vehicle is able to carry.

Q25: What would be the financial impact to your business or organisation of the proposed headroom requirements for both short and long journeys? Please explain any impacts provided.

N/A

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.

N/A

Q27: What would be the financial impact to your business or organisation of prohibiting transport during Beaufort Wind Force of 6 or above? Please explain any impacts provided.

N/A

Q28: Do you think that there should be any exceptions to the previously mentioned proposals alongside the specific exceptions already outlined, excluding the proposal to prohibit live exports for slaughter and fattening? Please provide evidence.

There is a need for exceptions to be available in cases where weather or road conditions prohibit a journey being undertaken in the usual fashion. Either because a journey,



unfortunately, exceeds time limits or because a consignment has to be diverted to a new destination due to unforeseen circumstances. Equally, it may, occasionally be necessary to exceed either space allowances or headroom in exceptional circumstances or where animal welfare is better served by transporting the livestock rather than them remaining at their present location.

Q29: What conditions should be met in order to ensure animal welfare is protected in the case of other exceptions?

Provided journeys are being conducted by appropriately regulated transport and qualified persons there is no reason why exceptions cannot be undertaken in a way which maintains animal welfare.

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.

In some instances it may be applicable for transporters to obtain season specific exceptions to allow journeys to be undertaken in a timely and suitable fashion. These could be granted on a month by month basis and reviewed regularly to ensure they are being used appropriately and not being abused.