

Farm Animal Welfare Committee's opinion on the welfare of animals during transport: Scottish Government consultation. February 2021



**Q.1. Do you agree with the FAWC recommendations for future research and the Scottish Government's position and proposed course of action? Please provide any further relevant information.**

We agree with the FAWC recommendations for future research, and especially urge that research in the identified priority areas is undertaken without delay.

The response of the Scottish Government seems somewhat vague and, although expressing a general agreement with FAWC, does not propose any particular course of action. We understand that "*funding is subject to the consideration of other priorities*" but suggest that it is time for the list of priorities to be reshuffled. Our food systems have for too long functioned to produce large quantities of cheap food, at the expense of our human, environmental, and animal wellbeing. It is time for that to change. If we continue to transport animals for commercial gain it is a moral obligation to fund the research needed to ensure we do so with as little negative impact on them as possible.

**Q.2. Do you agree that prior permission should be obtained from the relevant UK authority for some journeys exporting live animals and permission should only be granted if the reasons for not undertaking a shorter alternative journey are justified? Please provide any further relevant information.**

OneKind does not agree; we are disappointed that the Scottish Government has not proposed an end to live exports for slaughter or fattening, as the UK government has. Scotland risks falling behind on animal welfare standards within the UK – a regretful and worrying situation given that the opposite is frequently the case. Moreover, the lack of a ban on live exports from Scotland will threaten the integrity of a ban in England and Wales; in the absence of restrictions on animals moving from those countries to Scotland there will be nothing to stop them then being exported.

We understand the Scottish Government's concerns around the challenge created by the geographical constraints of the islands. However, transport from the islands is within Scotland and therefore not export. While there are welfare concerns associated with transport from the islands, that should not be ignored, consideration of them should not be a barrier to ending live exports. The circumstances in the highlands and islands of Scotland are unique and should be treated as such, but not be allowed to inhibit improvements in animal welfare overall.

A ban on live exports is something that OneKind has advocated for years. Live exports should be replaced with a trade in meat, carcasses, embryos, and semen, which is entirely feasible.

Live exports are unnecessary and harmful to animal welfare. There are well documented welfare concerns attached to long journeys in general, as well as specific concerns caused by aspects of export, such as border controls. FAWC found that facilities at Ramsgate port, for example, were inadequate to allow inspection of individual animals to assess fitness for transport. (Notably, they found that the opposite was true of facilities at Aberdeen, where animals from Orkney and Shetland arrive, supporting our request that the Scottish Government consider transport from the islands separately to live export.)

Other concerns include the possibility of lower standards in destination countries, extension of journeys due to border control procedures, and the additional welfare risks of sea crossings.

A [series of audits](#) carried out by the European Commission Directorate-General Health and Food Safety (DG Sante) between 2017 and 2019, on the welfare of animals exported by road, highlighted various problems, including:

- Transport of unweaned and unfit animals
- Vehicle guidelines not being followed, including unweaned animals being transported in vehicles with inadequate drinkers and partitions
- Poor animal handling
- A lack of follow-up on reports of non-compliance, and the fact that severity of non-compliance is not specified, giving no picture of the extent of reduced welfare caused
- Inadequate inspections, record-keeping and co-ordination throughout the systems, and a lack of technology required for member states (MS) and the Commission to monitor and evaluate transport, meaning it is impossible to have an overview of welfare conditions
- Lack of compliance once vehicles leave the EU
- Serious welfare risks at EU borders, including extended waits in high temperatures at the Bulgaria-Turkey border and departure of inadequate vessels carrying livestock from Romania

Once animals have left the UK their welfare is outside of our control or influence. Banning live exports would help us fulfil our responsibility to ensure life-long good welfare for our farmed animals.

Returning to the issue of transport from the islands, we recommend that one of the key approaches is to rebuild a network of small local abattoirs. This will improve animal welfare throughout Scotland by reducing journey times but will also be part of a solution to the challenges faced by the islands.

Furthermore, it should be part of a larger scale and necessary reform of our animal farming practices. We welcome the statement from the Scottish Government that:

*“We will also consider how government policy and retailers might better enable regional supply chains and support essential infrastructure like abattoirs.”*

We would urge you to go further and see the return of local abattoirs as part of a fundamental shift back to smaller scale, less intensive farming and a return to locally produced food and short supply chains. The urgent necessity of this is evident in all

of the crises we are currently facing: climate change, biodiversity loss, and the spread of viruses and zoonotic diseases all have well-evidenced links to agri-food systems and intensive animal farming. Dramatic change is recommended by, for example, the [United Nations Development Programme](#) and [Chatham House and the United Nations Environment Programme](#), amongst others, The Scottish Food Coalition have excellent [recommendations](#) for beginning the necessary work in Scotland.

Within Scotland there is a strong demand amongst farmers and other stakeholders for a return to a network of small, local abattoirs. Animal welfare is one of the main reasons given, alongside: meat quality; providing value-added local, traceable meat; sustaining rural communities and economies; environmental sustainability; and providing niche services such as those required for organic or low-carbon businesses or raising native breeds (i.e exactly the type of businesses that need to be supported as we transition to less intensive animal farming).

There are examples of farmers already reaping these benefits in Scotland, such as [Peelham Farm](#), which raises organic, free range cattle, sheep and pigs, and has an on-farm butchery. Such welfare friendly initiatives should be supported financially and otherwise; Scotland's current agricultural policies do not do so sufficiently.

The Scottish Government report [Assessing the Viability and Sustainability of Mobile Abattoirs in Scotland \(2020\)](#) found that most farmers “were supportive of a “local” abattoir service, regardless of whether this was mobile or a static service.” Other stakeholders were also supportive, including most butchers questioned and the Orkney auction mart. Orkney, despite having a high density of cattle and a strong local provenance brand, does not have a slaughterhouse.

A report by the UK All Party Parliamentary Group for Animal Welfare (APPGAW), [The Future for Small Abattoirs in the UK \(2020\)](#), concluded that:

*“Loss of [small abattoirs] will be detrimental for the communities who live and work in rural areas, for animal welfare and for the rural economy.”*

And that:

*“small, well geographically distributed abattoirs provide the opportunity for transport to slaughter to be shortened and this meets the Government’s objective that opportunities should be sought for a short, single journey. They may also help to reduce illegal slaughter, facilitate emergency slaughter, provide slaughter for wider species and benefit the welfare of animals born and reared on a single farm by avoiding mixing of unfamiliar animals.”*

They quote a farmer from Orkney:

*“Small abattoirs give small lots of native breeds experienced, relaxed handling, giving the animals the time they need to feel confident to move calmly to the stunning area.”*

APPGAW also noted additional animal welfare benefits that small abattoirs can bring. For example, frequently the Official Veterinarian for small abattoirs sees animals being slaughtered that come from local crofts, who are her/his clients. S/he can provide those clients with information gained from ante and post mortem inspections about changes to husbandry practices that could improve health and welfare.

We were pleased to note the formation of an Abattoir Sector Group following this report, whose goal is to help the UK and devolved governments to restore a network of small abattoirs. We encourage the Scottish Government to engage with them fully.

Thus, we urge the Scottish Government to support the return of a network of small abattoirs, either mobile or static, as part of a wider reform of the agricultural support framework and our food system. Animal welfare must be prioritised above other considerations that have historically been so, such as commerce and the production of high-volume, cheap food.

As long as the requirement for some transport for the islands remains, we do not oppose there being certain derogations to, for example, maximum journey times, as long as welfare continues to be prioritised, as it has been with superior conditions on ferries.

**Q.3. Do you agree with the Scottish Government's position on determining fitness for transport and proposed course of action? Please provide any further relevant information.**

Yes, we agree with both the FAWC recommendations and the Scottish Government's response to them: an improved definition of fitness for travel; education and guidance on determining fitness; and a review of penalties for transporting unfit animals will all reduce the instances of unfit animals being transported.

The [EC pilot project](#) aimed at improving animal welfare during transport produced and disseminated detailed guides and factsheets, and the impact assessment reported good levels of satisfaction and improved knowledge in workers surveyed afterwards. However, they have possibly not been well utilised in the UK. Re-launching and promoting them more widely could help improve knowledge, including of how to identify fitness for transport. The latter would be facilitated by a clear definition, so we agree with re-examining it to ensure that it is not open to misinterpretation.

We also agree that the recent Animals and Wildlife (Penalties, Protections and Powers) (Scotland) Act 2020 provides an opportunity to introduce alternative penalties such as Fixed Penalty Notices for transport offences, and support the Scottish Government doing so. Further research into the motivations of people who breach current legislation will be valuable in deciding how best to tackle it.

**Q.4. Do you agree that there should be no distinction between registered and unregistered horses in future legislation on welfare during transport? Please provide any further relevant information.**

Yes, we agree that there should be no distinction between registered and unregistered horses, due to the welfare risks highlighted by FAWC. If the Scottish Government agrees with this “*in principle*” then that principle should be followed. Exempting certain owners or hauliers dependant on their “*ability to provide for welfare needs during transport*” opens up the possibility of biased decision making and welfare risks. For those with registered equines and the ability to provide high welfare during transport, a requirement to obtain the necessary certificates is not too onerous.

**Q.5. Do you agree with the Scottish Government’s position on the means of transport and proposed course of action? Please provide any further relevant information.**

We agree with the FAWC recommendation that all vehicles that transport livestock and horses should be inspected by vehicle approval bodies, regardless of journey length, and accelerometers retrofitted to provide evidence of driving conditions when there is cause for concern.

We do not agree with the Scottish Government that these should be dependent on “*a proportionate and risk-based approach*”. The welfare risks must take precedence over other risks, which presumably will be of an administrative, logistical, or financial nature. Prioritising the welfare of sentient beings above such concerns is a moral obligation.

**Q.6. Do you agree with the Scottish Government’s position on the maximum time an animal may spend at market and proposed course of action? Please provide any further relevant information.**

Yes, we agree with the FAWC recommendations and the Scottish Government’s position of agreeing with them. We urge the Scottish Government to ensure that this position leads to action. As long as animals continue to be traded at markets measures to improve and ensure their welfare are necessary.

**Q.7. Do you agree with the Scottish Government’s position on space allowances for animals in transport and proposed course of action? Please provide any further relevant information.**

We agree with setting species-specific minimum headroom heights. However, measuring the height at the head is problematic, as explained in the [EFSA scientific opinion concerning the welfare of animals during transport \(2011\)](#):

*“For cattle that tend to stand during the journey, the ceiling must be set well above all the animals when they are standing with their heads up in a natural position. This headroom will ensure adequate freedom of movement. However, it remains unclear from this statement, how the height of the animal is determined. One definition of the height of cattle is taken as the height at the withers. The range in height can vary between animals. Therefore, it is recommended to determine the height of the deck or compartment as the space between the withers of the tallest animal per deck.”*

We agree with this recommendation to measure the height of the tallest animal at the withers, for all species. Research conducted on this topic, and future reforms, should use this as their standard measurement. Currently, we support following the headroom recommendations of Eurogroup for Animals in their white paper, [Live Animal Transport: Time to Change the Rules \(2021\)](#).

We agree that allometric principles should be used as a basis for future space allowance calculations. We understand the Scottish Government's desire to research how this would be implemented; this research should be carried out without delay and the results should inform regulatory reform.

**Q.8. Do you agree with the Scottish Government's position on transport practices and proposed course of action? Please provide any further relevant information.**

We support the FAWC recommendation that all animals being transported should be protected by the same regulation, whether that transport is for commercial purposes or not. This will ensure consistent strict adherence to welfare standards. For those who are transporting animals with sufficiently high welfare, obtaining the required certification and authorisation is not too onerous. Anybody transporting animals in sub-standard conditions must be required to make improvements.

**Q.9. Do you agree with the Scottish Government's position on thermal conditions and ventilation for animals in transport and proposed course of action? Please provide any further relevant information.**

We agree that FAWC's recommended temperature ranges should be used as a guide in the way proposed by FAWC, and that further research and evidence would help inform further refinement of these parameters.

We are glad that the Scottish Government also agrees, "*in principle*." However, we are concerned that the Scottish Government's failure to actually propose a course of action, and the use of the word "*could*", imply a lack of commitment to make the necessary changes.

OneKind urges the Scottish Government to commission the required research without delay, as we agree with FAWC that this is a research priority, and to then introduce species and age specific temperature and ventilation requirements, based on the findings.

Both the FAWC and SRUC recommendations mention that it is necessary to distinguish between different ages and categories within species, as well as between species, as requirements can vary widely for various factors including temperature. Some examples regarding temperature include:

- Newly hatched chicks have specific micro-environmental requirements, including a narrower temperature range. The current SRUC advice, until evidence gaps are filled, is for chicks to be transported in a micro-climate of around 25°C and 60% relative humidity.

- Young piglets are relatively weak and sensitive to low temperatures.
- In horses, there are temperature tolerance differences between and within breeds.
- STUC found that: *“Subjecting goats to even 2-hour road transportation with high ambient temperatures can generate major physiological and muscle metabolism responses.”*

Poultry should have tighter requirements, as they are more vulnerable to the effects of temperature. The SRUC review concluded that:

*“A range of studies confirm the heterogeneity of thermal loads on transporters under different ambient temperatures (up to 40 degree differences between different locations have been recorded). It is thus possible for birds to suffer hyperthermia and hypothermia at different locations in the same truck. Modelling studies suggest that mechanical ventilation can provide a solution to these issues and thus this and temperature monitoring is strongly recommended for all poultry transport vehicles.”*

Although, elsewhere, they refer to this recommendation for journeys over four hours, OneKind is concerned that this is a somewhat arbitrary cut-off point and there is a risk that birds could still suffer from temperature related stress within that time. Additionally, a four-hour planned journey time can easily end up being extended by unexpected delays.

Thus, we would recommend a requirement that all vehicles used to transport poultry must have a thermo-regulation system to maintain consistent internal temperatures within the specified range.

**Q.10. Do you agree with the Scottish Government’s position on maximum journey length and proposed course of action? Please provide any further relevant information.**

OneKind believes that all transport of farmed animals for fattening or slaughter should be minimised, and animals slaughtered as close as possible to their place of birth and rearing. There should be a shift towards a trade in meat and carcasses, embryos and semen. As such, we agree with the conclusion of the SRUC review that:

*“The over-riding concern should be to minimise transport time (as proper recovery is unlikely to be achieved during a feasible rest period), whilst meeting the requirements of some species for food and water.”*

And with FAWC that:

*“FAWC recommends that animals are only transported if it is absolutely necessary, and that the most welfare considerate route is chosen [...] Therefore, animals should not be transported longer distances if suitable alternatives are available.”*

While FAWC made this statement in relation to live exports we believe that it applies equally to journeys within the UK.

For those journeys that remain, we recommend a maximum journey time of eight hours for all adult mammals, reduced to four hours if they are young or end-of-production, and four hours for poultry; this is in line with Eurogroup for Animals well-evidenced [proposal](#).

We therefore accept the FAWC proposed maximum journey times, as an improvement on the current situation, if they are genuinely treated as maximums not norms, and are part of a continued commitment to transition to local slaughter and fewer, shorter journeys.

That transition must include a review to:

*“identify where abattoirs need to be sited in order to meet the needs of farmers and to minimise journey times and thereby meet the welfare needs of animals,”*

and

*“further research into the feasibility of the economics, design and use of mobile slaughter facilities so as to reduce the need to transport animals over long distances particularly with regard to sea crossings.”*

As discussed in detail in response to a previous question, these provisions are necessary to reduce journey times overall and will also address the concerns of the Scottish Government related to animal transport from the islands. As stated previously, we are not opposed to certain derogations for animals being transported from the islands, as long as the proposed measures are taken to minimise the required journeys, and the welfare of the animals that do make those trips continues to be prioritised.

**Q.11 Do you agree with the Scottish Government’s position on mid-journey breaks and proposed course of action? Please provide any further relevant information.**

We agree with the Scottish Government that driver and animal rest periods should be aligned if possible, but that it is unclear whether this would work in practice and further research is required.

FAWC somewhat contradict themselves in their recommendation on this point – they state that:

*“A rest period must allow the animals to exhibit normal behaviour. Therefore, a rest period is not considered rest if the animals are on concrete, in a pen with minimal bedding, or time on a lorry that is not moving. A mid-journey break would not be considered an actual rest but an opportunity for the driver to make any checks on the animals in transit, and to allow the driver to rest.*

*[...] The 1/2005 Regulation stipulates that the 1 hour journey break is a minimum (and therefore a longer break is supported). However, a concern arises from this as there is a need to limit the overall journey length whilst ensuring the animals are suitably rested and allowed to eat or drink during the rest period. Evidence has indicated that sheep may require a 3 hour mid-journey rest break so that they are able to eat and drink. Different species or subgroup-specific (young, juvenile, adult or end of life) will require different rest periods to allow them to adequately rest, and to consume feed or water and stocking density must be suitable to facilitate rest and access to food/water.”*

Their recommendation for 45-minute breaks every 4.5 hours does not seem to reflect these statements.

The provision of rest stops may appear benign but in practice can allow for repeated unloading and re-loading, which is stressful for the animals and exposes them to the risk of rough handling, contrary to their welfare. The 2002 [Report of the Scientific Committee on Animal Health and Animal Welfare on the welfare of animals during transport \(details for horses, pigs, sheep and cattle\)](#) stated: *“For most livestock transport, loading, with associated handling or driving, is the most stressful part. Unloading is often also stressful. The disturbing aspects are fear, and sometimes pain, caused by humans; forced physical exercise especially on steep ramps; and stress caused by the unfamiliar loading procedure, vehicle conditions and social contacts. There is also increased risk of injury. Poor welfare during loading is evident from a range of measures including: stopping, turning and being difficult to drive, fear induced vocalisations, high heart rate, high cortisol concentration in plasma or saliva and high concentrations of other hormones.”*

Despite the concern about loading and unloading, we do not support the provision of rest on board the vehicle either, as this allows no respite from overcrowding, high or low temperatures, dirty flooring etc and does not ensure proper observation of the animals, provision of food and water for each individual, or the ability to relax and recover.

These difficulties, along with many others, support the point that animal transport should be minimised, and remaining journeys should be short.

**Q.12 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.**

We agree with FAWC that all drivers should require a certificate of competence, regardless of journey length.

**Q.13 Do you agree with the Scottish Government’s position on transportation of animals by sea and proposed course of action? Please provide any further relevant information.**

In general, OneKind agrees with the position of the Scottish Government on transportation of animals by sea. We note the superior conditions and specialised systems in place on the ferries transporting animals from the islands and understand that these have been developed over the years to prioritise welfare, informed by knowledge and experience. We agree that this should be taken into consideration when evaluating and regulating these journeys.

However, we do not agree with the concept of 'neutral time'. While the time spent on these ferries may not be equivalent to road or other travel, it is also not equivalent to farm accommodation. It seems likely that there will be effects on the animals from the movement, from being in an unfamiliar environment, and possibly from other factors. Exactly what those effects are, and the welfare implications, should be explored more thus we welcome the Scottish Government's willingness to support research in this area.

Such research and any regulatory reform must occur alongside a continual shift to fewer and shorter journeys, as detailed in some of our responses to previous questions.

**Q.14. Do you agree the Scottish Government should consider the proposed review on research into transportation by rail or air alongside other research priorities? Please provide any further relevant information.**

Whilst OneKind supports necessary research in any area that potentially impacts animal welfare, we do not see transport by air or rail as a research priority as it has limited application in Scotland. We would prefer that the Scottish Government invests in measures that will reduce the transport of animals overall, and in other research that is much needed to improve welfare during transport by road and sea, as discussed elsewhere in this response.

However, this position assumes our request that live exports be banned is met. If animals continue to be exported outside of the UK then we lose control over any further transport they may have to endure. It was recently [disclosed](#) that more than 1500 sheep shipped from Cairnryan to Larne last year ended up being transported on to an unknown destination in mainland Europe or further afield, despite journey logs showing their final destination as the Republic of Ireland.

Ireland is currently investigating the feasibility of [transporting unweaned calves by air](#) to mainland Europe. If transporting animals from Ireland by air becomes routine, and the final destination of Scottish animals cannot be guaranteed, then air transportation does become a priority concern. However, welfare standards would be beyond the control of the Scottish (or UK) Government, thus investment in research on the topic would not necessarily be beneficial.

This, once again, highlights the need for a ban on live exports.

**Q.15 Do you agree with the Scottish Government's position on the collection and use of feedback to identify welfare risks in transport and proposed course of action? Please provide any further relevant information.**

Yes, we agree with the Scottish Government's position and proposed course of action regarding the use of feedback to identify welfare risks.

**Q.16 Do you agree with the Scottish Government's position on the enforcement of welfare of animals in transport and proposed course of action? Please provide any further relevant information.**

OneKind supports the position of the Scottish Government on this matter.

**Q.17 Do you agree with the Scottish Government's position on post-export protection of animal welfare and proposed course of action? Please provide any further relevant information.**

As previously stated, OneKind strongly recommends an end to live export. If this practice continues, it is imperative that animals are not exported to destinations where welfare conditions are lesser or contrary to UK standards. We do not accept the position of the Scottish Government on this point; it is not acceptable to agree only "*in principle*", those principles must be followed.