



Defra consultation on improvements to animal welfare in transport:

Ruminant Health & Welfare (RH&W) principles

This is the response of Ruminant Health & Welfare (www.ruminanthw.org.uk) to Defra's Consultation on improvements to animal welfare in transport. Ruminant Health & Welfare is an independent industry-based body with a mandate to push back on the impact of ruminant disease and build the welfare status and production efficiency of the UK's national flock and herd. Its membership spans all four nations and includes representatives from across the whole supply chain (pharmaceutical, veterinary, advisory, breeding, farming, assurance, health & welfare and government). This response has the support of the group with the exception of those members who work for government or government agencies who are precluded from expressing views and the RSPCA, who welcomes and supports the government proposal to ban live exports for slaughter and further fattening.

Introduction

RH&W values the opportunity to comment on the proposed changes to animal transport regulations and export standards. The group will not respond in detail to the Defra consultation on improvements to animal welfare in transport, December 2020, but will highlight areas where the consultation process should be focused and where stakeholder input can add value.

The group will outline principles that we believe should be recognised by all parties; principles which should underpin the development of the proposed new regulatory framework. The clear priority of safeguarding and improving animal welfare requires evidence-based, workable, targeted intervention which is both deliverable and enforceable.

The section outlining key principles draws examples from the Defra consultation but is not a comprehensive analysis of the proposed changes and is not intended to be that.

RH&W however encompasses a broad range of interests with links to key industry, animal health, welfare, and veterinary organisations. These bodies and organisations will in many cases use their own professional expertise and experience to make detailed comments on the proposed changes and we believe time should be taken to use that resource to take the development process forward.

Principles

1. AIMS – RH&W believes that safeguarding the welfare of animals should be the primary focus of any regulatory change, recognising that the existing European regulatory framework has underpinned high operating standards within the UK.

2. ENFORCEMENT – Appropriate regulation must be supported by effective monitoring and enforcement. Some of the welfare problems identified in other European jurisdictions are the result of non-compliance and weak enforcement, not regulatory failure.

3. EVIDENCE BASE – Changes to regulation should be evidence-based, rooted in science and building on real world experience. Both SRUC research and the Scottish Government's monitoring of calf exports are significant resources which can be drawn upon.

It is clear that the Farm Animal Welfare Committee (FAWC) has played a pivotal role in mapping out priorities; it is however unclear what specialist expertise has informed the detail of the proposals. For example, vehicle construction standards and the design of ventilation systems to optimise air flows are specialist areas that require the input of professional expertise.

4. IDENTIFICATION OF PRIORITIES – The proposed changes are wide-ranging, impacting on both fundamental infrastructure – including vehicle construction standards – and the operational practices across the species. Clearly the profile and frequency of regulatory failures and non-compliances which were either investigated, or resulted in enforcement action over the period of the current regulation, would inform stakeholders and indicate priorities. That basic assessment of the performance of the current regulation is a key part of any review and consultation process and should be shared to inform both consultees and legislators.

5. WELFARE BENEFIT – New Regulatory standards should be subject to a welfare benefit assessment and cost benefit analysis before they are formalised into regulation; the assessment results should be published to support the scrutiny of the proposed legislation. The introduction of temperature monitoring and forced ventilation to long distance transport vehicles is one of the positive welfare innovations supported by the current legislation. The extension of that requirement to all vehicles operating out with a temperature range of 5 to 30C may appear to be a step forward especially as extreme weather events are becoming more frequent.

However, it is clear that across the farmed species there is significant differences in their response to, and tolerance of, both high and low temperatures. Young animals including calves and lambs having

a reduced tolerance of extreme environmental conditions. A single benchmark temperature range for conventional transport is therefore unlikely to deliver benefit across all species. Adult ruminants for example may be stressed by temperatures over 30C but the lowest temperatures that are encountered across England and Wales during winter are not a problem.

Transport temperature bands for different species and ages should be considered to ensure that the extension of temperature management systems is targeted to deliver both welfare and cost benefit. The relevance of temperature monitoring and control to on-farm movements which are of very short duration, and may at times be prompted by the need to move stock to shelter or into safe areas in the face of extreme weather events, is also open to question.

6. SIMPLIFICATION – There are a significant number of changes to accommodation standards during transport for different classes of stock; some appear overly complex, for example the variations in headroom requirements for bovines of beef and dairy breeds without any clear evidence base. Simplification would be positive; complex standards can challenge both operators and those involved in enforcement. If complex change is required and progressed in this area, it might be a helpful simplification if specifications were formalised through constructional standards. This approach might mean decks and sections (penning) were officially plated to indicate the species, class and stocking rate that might be accommodated to comply with welfare standards.

7. UNINTENDED CONSEQUENCES – The strengthening of controls can have unintended consequences, none more so than regulatory intervention which stops a transport cycle. Journey plans have been an accepted device to ensure a safety net is in place which safeguards animal welfare when movement is disrupted. With the health status of livestock increasingly important and likely to be a pillar of future production systems, the contingency planning required in the event of journeys being blocked has become more challenging and more significant. There is a role for the competent authority to identify sites where bio secure lairage is available close to ferry terminals to ensure journey plans can ensure both welfare and health status are safeguarded.

8. TRADE CONTROLS – There is widespread agreement that UK livestock should not be exposed to welfare threats during transport or slaughter in other jurisdictions. The enforcement of journey times, vehicle specification standards and locking any export movement to a jurisdiction where welfare standards and enforcement are equivalent to those of the UK is an approach that can safeguard the welfare of UK livestock.

Defra's proposed ban on the export of animals for slaughter or further feeding clearly recognises welfare concerns linked to some export movements, but adopting a trade restriction shifts regulatory

control beyond the reach of animal welfare regulation and creates a catch-all trade standard. The adoption of a trade regulation approach will have implications for the classes of stock which were previously reared in Europe and create the need for a more interventionist approach to support and build regional abattoir capacity. Defra should, if a trade ban is implemented, take responsibility for the impact on businesses and support the development not only of sustainable high welfare rearing systems but markets for the classes of stock which have previously been reared in Europe.

Summary

The development of a new regulatory framework to underpin the welfare of animals in transport will inevitably become an early post-Brexit test of the Government's ability to deliver effective evidence-based welfare regulation. The national process will also demonstrate the ability of Government to add-value through stakeholder engagement and open consultation.

It is important for animal welfare and the livestock sector that the repatriation of regulatory responsibility does deliver these positive outcomes.

The RH&W steering group welcomes the extension of what was a truncated consultation period. Concerns remain however that the consultation was launched without a clear evidence base to support much of the detail, and that impact assessments were also incomplete. It is unclear that a limited extension for industry, expert, and professional bodies to input to the process will resolve these real concerns.

Alignment of regulatory standards across the UK is of value; the approach taken in the consultation paper to journey times and ferry movements appears to be disconnected from the experience and welfare imperatives of those working across the devolved nations, peripheral regions, and the islands. Without partnership working across the four nations, perverse outcomes or regulatory fragmentation are inevitable. Collaboration must now be a priority.

Clearly lessons must be learnt from the evidence and issues that have emerged over the last weeks. There is an opportunity now to adopt a more inclusive approach, to involve those with direct experience and relevant expertise to underpin the focus and design of the proposed legislation – in essence, a co-designed process.

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