

# Response ID ANON-U8J9-ERTY-M

Submitted to **Improvements to animal welfare in transport**  
Submitted on **2021-02-25 18:20:55**

## Introduction

### 1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason. If you answered No, input 'N/A':

### 2 What is your name?

**Name:**  
Mandy Nevel

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**Email:**  
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### 4 What is your organisation?

**Organisation:**  
AHDB

## Live Animal Exports

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

**Please provide your comments in the text box below:**

General Comments - applicable to multiple questions in this consultation.

AHDB is committed to science and supporting evidence-based policies. We are only able to respond in relation to livestock species that are within our remit – these are cattle, sheep and pigs. These general comments apply to multiple questions in the consultation.

While we recognise the importance of animal welfare as a top priority, and that it should be at the forefront of any consideration, we have concerns that proposed changes to the transport of animals has to date been largely driven by perceived wisdom rather than robust scientific evidence. Any future regulatory changes should be based upon robust, fundamental and applied science and not be derived from emotive concerns or political expediency. The journey to better feeding pastures or to slaughter is necessary. Recent welfare legislation has potentially had some unintended consequences and led to consolidation of slaughtering facilities with increased specialisation to enable species-specific welfare needs to be met. This has resulted in fewer multispecies abattoirs and resultant increased journey times for some animals. However, the benefits of improved handling and welfare at the abattoir has been deemed by experts to outweigh the increased journey time. If this is to be reversed in legislation, there must be robust evidence to support the change.

AHDB has concerns about how the FAWC report and commissioned literature review, on which the consultation is based, have been interpreted and believe greater clarity in the impact assessment is required in order for us to provide a more considered response. The proposals within the consultation overlook the clearly stated evidence gaps highlighted in the 2019 FAWC report and commissioned literature review. AHDB is concerned that the proposals, if enacted, will not deliver meaningful benefit to animal welfare but will create additional burdens to farmers and hauliers and increased costs on the UK livestock industry.

The need for changes in policy to be grounded in robust scientific knowledge has been emphasised by the experts:

‘It is important that as new regulations are made and old regulations are revised, they are formed from science-based information rather than from emotion or pressure from special interest groups.’ (Ref: Livestock Handling and Transport’, ed Temple Grandin, p 145).

This recommendation is repeated in the references supplied by Defra for this consultation e.g. FAWC p10:

‘Defra and the Devolved Governments consider that the welfare of animals may be further improved during transport and any improvements should be based on scientific evidence.’

Further in the same report, conclusion #80:

“The EU 1/2005 Regulation provides a basic framework that does offer a level of protection for animals during transport. However, serious practical implementation issues do exist, including; lack of .... determining maximum journey times based on evidence”

and conclusion #82:

"The most obvious areas of concern are; the lack of evidence to establish maximum journey times, the effects of sea transportation on the welfare of animals and establishing species-specific and within species, breed variable physiological and psychological needs during transport".

AHDB recommends that more consideration should be given to improving the mode of transport, driver behaviour, monitoring conditions and welfare during transportation. This is supported by the evidence e.g. that of non-compliance issues Table 5 p29 FAWC opinion, 2019.

Many studies show that regardless of the purpose of the journey and destination, the quality of stockmanship during transport (particularly at loading and unloading), and the animals' fitness to travel are the key priorities to ensure the best possible welfare outcomes. Therefore, the focus of reforms in animal transportation should be working with the industry to improve the awareness and approach of some operators within the livestock sectors. In particular around the understanding on the fitness of animals to travel and transporter responsibility for managing welfare throughout the journey in line with existing rules, guidance and assurance standards.

Our response to specific questions in the consultation is as follows:

#### Live Animal Exports

Response to this specific question:

No. We are unable to find scientific evidence or expert opinion to support this statement.

The same standards of transportation should be applied regardless of the purpose of the journey, in line with the legislation, and apply equally to breeding, fattening or slaughter animals. Animal health and welfare standards must be met for the entirety of the journey whether in this country or abroad, which are still linked by shared application of EU legislation 1/2005 for transport welfare.

It is concerning that these proposals suggests that the welfare outcomes for animals destined for slaughter and further fattening are worse than those for breeding. There is no evidence to support the assumption made in the consultation that the standards for animals exported for slaughter is lower. All animals hold intrinsic value, and it is in no one's interest for animals to suffer poor welfare during transportation.

AHDB is aware of public concern regarding live animal exports but recommends that amendments to legislation are based on scientific evidence with regard to animal welfare.

We agree with the sentiment of FAWC in #87 (a) that transport must be necessary and that a welfare considerate route is chosen. This should take into consideration the mode of transport, the species being transported, climatic conditions and should not be determined by the destination country alone. In #24 of the consultation, when considering where to finish or slaughter animals, it is possible that the nearest appropriate abattoir or finishing facility and/or with the shortest journey time, is in the EU. The need to protect animal welfare at slaughter has driven the move to fewer but larger abattoirs with more sophisticated and specialised facilities. While there may be others located en route to one at a greater distance, the abattoir further away may be more appropriate for the species, number of animals to be slaughtered and the ultimate destination of the product. Additionally, FAWC #120 'Pre- and post-journey factors, such as farm type, housing (indoor on slats or outdoor for example), and abattoir standing time may have a bigger impact on welfare in transit than journey time per se.'

The proposal does not intend to ban movements between GB and Northern Ireland (or from British islands surrounding the mainland) and the rationale of this on the impact on animal welfare is not clear.

Some journeys to EU countries could involve shorter journey times, distances and smoother sea crossings than journeys within the UK, yet are not part of these proposals.

#55 uses emotive language 'enduring excessively'. An export journey may not be any more enduringly excessive than one within UK. An animal does not know the purpose of its journey. The example of filtration to reduce disease of pigs is largely irrelevant as if the animals are intended for slaughter, reduction of disease transmission in transit is a low risk and such a system for this reason is unnecessary.

It is of greater importance to the improved welfare of livestock that all exported animals are fit to travel, and that the quality of the handling, driver behaviour and conditions of the transportation are considered—irrespective of purpose, distance and/or duration of the journey.

Finally, post Brexit, there is potential for change to existing trade structures and marketing routes. It would be unwise to limit options.

**6 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.**

**Please provide your comments in the text box below:**

No. Legislation should be based on evidence around welfare, not the destination. The term 'soon' is vague.

Animals should not be exported into systems that operate to lower welfare standards than those in the UK, or into systems previously banned in the UK. However, consideration needs to be given to the EU's legislative baseline on farm animal welfare.

**7 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.**

**Please provide your comments in the text box below:**

No, see Q2

It will be necessary for Defra to objectively set out the scientific evidence and explain their perceptions as to the difference between journeys for slaughter and further fattening and those for breeding. As stated in Q1, the same standards of transportation should be applied regardless of the purpose of the journey.

Post Brexit, it would be unwise to limit options.

**8 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.**

**Please provide your comments in the text box below:**

As a levy board, AHDB are not directly involved in the export or trade of livestock. However, we are conscious that trade data relating to export of livestock is inconsistent and unreliable. Ideally, this data would inform an impact assessment to allow the economic implications to be incorporated.

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

**Please provide your comments in the text box below:**

N/A

## **Maximum Journey Times**

**10 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.**

**Please provide your comments in the text box below:**

No. We are unable to find scientific evidence to support these proposals.

FAWC #97 states that there is little evidence of the journey time/duration on animal welfare. Further, FAWC say that 'it is not possible to make evidence-based recommendations on the maximum journey length / duration for all animals that are transported.' They also say that 'according to current legislation, in all cases, and wherever possible, the shortest journey length must be selected.'

The impact assessment states at p.69 "The scientific evidence linking specific journey times and welfare conditions with mortality and morbidity impacts is still developing". Therefore, there is insufficient evidence as to the extent to which individual animal welfare will improve as a result of these measures. In addition, within the FAWC report and commissioned literature review, the suggested journey times for each species and references to the papers differ to those proposed in the consultation. A full explanation and provision of the evidence base for these further reduced journey times will need to be provided before AHDB can comment further on the acceptance of these proposals. However, there is evidence that loading, with associated handling or driving is the most stressful part. The Scientific Committee on Animal Health and Animal Welfare report on welfare during transport (2002).

There has been much research conducted in the past, including that funded by Defra, that has proven journey length does not influence the welfare of animals as long as the conditions and temperatures are controlled and within acceptable limits.

1 [https://ec.europa.eu/food/sites/food/files/safety/docs/sci-com\\_scah\\_out71\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/sci-com_scah_out71_en.pdf)

2 <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.1966> (p24)

We will not make comment on impacts on regions/organisation

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

**Please provide your comments in the text box below:**

Yes, there is a need for exceptions to any maximum journey times.

Provision should be made for exceptional circumstances. With the consolidation of abattoirs in recent years to more species-specific abattoirs (and improved welfare), a single abattoir suffering closure (e.g. mechanical breakdown or disease outbreak) will result in increased journey times for some animals. It is vital that potential for additional capacity is also accounted for.

There are examples where such an exemption has proved necessary to safeguard animal welfare. During 2017, an abattoir in Scotland was taken out of production for three months following a fire. As it was the only large pig abattoir in the country, pigs had to be moved to other plants within the UK to be slaughtered and this included Northern Ireland because of capacity issues. Transporting pigs from the mainland to the Northern Ireland is not common as it is prohibitively expensive, but it does form an important contingency for the major pork processors. It is important that this low volume but crucial trade be allowed to continue when necessary and an unintended consequence of changes may in certain situations, worsen animal welfare.

In 2019 a large abattoir in Yorkshire needed to refurbish and reduced capacity causing many pigs to be also sent to NI for slaughter

The sheep sector is seasonal and tends to mature differently in different regions across the UK. Animals from the south west will be ready for slaughter far earlier than those from the Scottish borders. Currently, animals travel from the south to the north late summer and in the opposite direction late autumn. The animals will go through collection centres / markets and it would be unwise to limit these options.

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

**Please provide your comments in the text box below:**

There should be a greater emphasis placed on competence training for hauliers, which should include developing measures for what contingency actions should be taken by transporters in the event of an emergency or transport delay. There is also the opportunity for the development of apps technology to ensure alternative routes and rest stops are considered, and could combine with guidelines/checklists on the fitness of animals to travel during loading. Such apps have been used with much success for sheep in New Zealand.

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

**Please provide your comments in the text box below:**

AHDB recommends a full impact assessment to be completed to allow informed response.

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

**Please provide your comments in the text box below:**

N/A

**15 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.**

**Please provide your comments in the text box below:**

No. AHDB is unable to find evidence to support this. In addition, such a requirement is likely to have unintended consequences that reduce animal welfare.

Where the transport period is stretched to accommodate a 48-hour rest period between journeys, stress is likely to increase as the overall stress period is lengthened. Greater emphasis should be placed on areas where robust evidence demonstrates welfare can be improved in transport, for example, handling, route selection and driver training.

Calves destined for slaughter may already have low value, particularly where the milk price is high. Increasing the costs of transporting these animals for slaughter will likely reduce their welfare rather than improve it.

For example, the movement of calves which is currently made viable for the calf buyer in certain geographic areas by having calves brought to a collection centre. If the calves would then need to be 'held' for a period of 48 hours before the journey on to a rearing unit, this is likely to result in increased disease transmission at the holding centre and the additional costs for holding pens and feed would deter use. This may result in the unintended consequence of euthanasia of lower value animals on farm.

A key issue, previously identified, is that the total travel time before a rest for breeding pigs is not aligned with the driver's legal hours. This can cause problems for drivers who may have to drive as long as possible before a stop.

There is also an issue with the requirement for a minimum 48-hour rest time for breeding pigs. Previously funded MAFF research (1998) found that no more than 10 hours rest was required, AHDB recommends that more research in this area is conducted before a change in the legislation.

Markets and collection centres are used for multiple purposes, but in all cases most of the animals are in and out within 12 hours. Longer stays without major redesign could cause welfare and disease issues – specifically:

1. If an abattoir has had a breakdown - the animals are diverted to a collection centre to overnight and rest. They are normally reloaded the following morning (12 –18 hrs)
2. If animals are travelling long distances the animals will be overnighed in a collection centre
3. Mixing of animals would be likely and disease breakdown could occur within 48 hours resulting in many animals being unfit to be transported.

The focus should remain on rest stops to lessen fatigue not the animal returning to 'normal'. A longer rest period would simply mean a longer overall period of disruption which could have greater effects on welfare. The objective to ensure that the animal reaches its destination in the optimum time minimising unloading and reloading situations, recognised to be the most stressful part of transport, which may be necessary if additional or longer rest stops are required.

Refs:

MAFF: Riches et al. (1998). Behaviour and welfare of breeding pigs during extended journeys, project AW0915.

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

**Please provide your comments in the text box below:**

No. AHDB is unable to find evidence to support this.

A full impact assessment of this measure on industry is required. The unintended negative consequences on welfare, disease prevention, and financial implications to industry could be significant.

Pettiford, et al. (2008) in a study of physiological measurements in young steers indicated that most stress occurred during loading and the initial stages of transport, but after this, the cattle habituated and were able to cope with six hours of transport. After 17 hours of recovery, nearly all the physiological measures monitored had returned to their pre-transport levels. In addition, the commissioned literature review (Mitchell, et al, 2018) states "In support of current practices and legislation there is evidence that the 24 hours rest in the lairage, with hay and water freely available, allowed the cattle to recover substantially following long journeys."

This proposal will mean that animals may have to be held at markets/sale rings for seven days which would cause welfare and disease issues. Animals travelling to show would similarly need to be housed at the show ground for an additional period.

Refs:

S. G. Pettiford, S. G., Ferguson, D. M., Lea, J. M., Lee, C., Paull, D. R., Reed, M. T., Hinch, G. N. and Fisher, A. D. (2008). Effect of loading practices and 6-hour road transport on the physiological responses of yearling cattle. *Australian Journal of Experimental Agriculture* 48(7) 1028-1033

<https://www.publish.csiro.au/an/ea08051>

Mitchell, M. A., Martin, J., and Kettlewell, P.J. (2018). A review of the evidence on welfare aspects of the transport of live animals. Defra Project AW0821. SRUC and University of Edinburgh.



**Please provide your comments in the text box below:**

As a levy board, AHDB is not directly involved in activities that involve the movement of animals. However, as indicated in the previous answer, there are a number of days when livestock journeys would not be possible or severely restricted, based on these proposals. This would have significant knock-on impacts for the efficiency and viability of our food supply chain. An inability to plan volumes, schedule labour in processing plants, or meet customer orders are all practical (and costly) challenges that potentially result from this proposal. With a real risk that supply chains could be slow or unpredictable, the risk is that key retailers of meat products look to source supplies from countries where there is no potential supply disruption.

**21 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.**

**Please provide your comments in the text box below:**

Rather than add species to this list, there is a rationale for revisiting the animals included in the scope of this proposal. There are significant differences related to transporting day old chicks versus prime beef animals to slaughter, for instance.

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

**Please provide your comments in the text box below:**

N/A

**23 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?**

**Please provide your comments in the text box below:**

N/A

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

**Please provide your comments in the text box below:**

Producers and hauliers are already required to use mitigations to avoid transporting livestock in extreme weather conditions, under existing EU legislation and farm assurance standards. Current practices are that when temperatures are high during the days, transportation takes place overnight, or earlier in the day before temperatures peak, and stocking densities are routinely reduced. These issues could be further improved through addressing driver training/behaviour, raising awareness of potential problems that might arise, for example traffic congestion and finding alternative routes to avoid prolonging journey time.

Other possible measures to consider would be the requirement to book time slots to ensure vehicles do not wait to unload livestock in extreme temperatures, but this would require additional resources to manage and set up.

A combination of sprinklers and fans can be activated to cool pigs when the temperature within a vehicle is too high (Haley et al., 2008).

Refs:

Haley, C., Dewey, C.E., Widowski, T. and Friendship, R., 2008. Association between in-transit loss, internal trailer temperature, and distance travelled by Ontario market hogs. *Can. J. Vet. Res.*, 72, 385-389.

## **Space Allowances**

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

**Please provide your comments in the text box below:**

AHDB agree that there is good evidence from studies in cattle, sheep and pigs that supports the use of allometric equations (relating size to body weight) in calculating stocking densities or space allowances. The allometric approach has been widely accepted as the most appropriate way to assess space requirements across different weight ranges and allows different postures and activities of the animals to be considered. However, the k values used for pigs in such equations are usually in reference to on-farm space allowances for different postures, and it may not be appropriate to extrapolate these as the same for transportation. It is also important to also account for any special requirements for the type of animal (i.e. if animals are horned, or for sheep if they are fleeced or shorn) or for an activity that needs to take place during transport (e.g. feeding and watering). In addition, for pigs, some further research is required relating to space requirements during transport for different classes of pigs, and the effects of the interaction of ventilation and space allowances on pig welfare (EFSA, 2011).

Whilst the use of allometric equations does appear to be based on sound science, the complexity of the calculations and that definitive K-values for all relevant transport situations and species have not yet been determined is likely to hinder the understanding of their use by industry. A more detailed explanation of allometric space allowance system will be required. Any review of space allowances needs to be considerate of a pragmatic approach to calculation and implementation in practice. Greater consideration in these proposals should be given to ensuring transporter competence and that animals are loaded and penned correctly according to the vehicle's internal dimensions and the animal's physical size.

Refs:

EFSA (2011). Scientific Opinion Concerning the Welfare of Animals during Transport. *EFSA Journal* 9(1):1966.  
<https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.1966>

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

**Please provide your comments in the text box below:**

There is a greater body of scientific literature on this for cattle and sheep, indicating that space allowances based on allometric principles are appropriate for both short and long journeys. However, there is very limited research on how journey length interacts with space allowances derived by this methodology to impact pig welfare, or other livestock species. More evidence is required to support the introduction of the allometric calculations of space allowance for different journey lengths for all species.

## **Headroom Allowances**

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

**Please provide your comments in the text box below:**

We agree that to protect their welfare, ideally, all animals should be able stand in their natural position with space above them to raise their heads during transport to avoid injury or discomfort and to ensure adequate ventilation. We note that the proposed species-specific recommendations for headroom allowances are drawn from limited scientific literature. However, there has been relatively little research into optimum headroom allowances for animals during transport, and empirical data for headroom requirements of animals during transport are very limited.

In addition, some of the empirical studies used for these proposals (Jones, 2003) relate to height allowances above the withers of animals and fail to take into account variations in head size and position or animal behaviours (such as standing positions and movements). The standing positions and movements of animals vary greatly depending on a number of interacting factors, including the type of animal within a species being transported (i.e. breed, age, sex, conformation, horn growth, social groupings and behaviour) and the nature of the journey (journey time, road quality, environmental conditions such as temperature and design of transporter) (FAWC, 2013; Mitchell, et al, 2018). There may also be interactions between animal space allowances and headroom, for example, in terms of ventilation which have not considered in the calculation of these proposed headroom requirements.

AHDB do not support these prescriptive head room allowance proposals, as they are based on very limited evidence that current headroom standards used in practice result in poor welfare outcomes. Further studies are needed to investigate optimum headroom allowances robustly for each species and class of animal, and the interaction between space allowances and headroom, for example in terms of effects on ventilation.

Refs:

FAWC (2013). Advice on space and headroom allowances for transport of farm animals.

Mitchell, M. A., Martin, J., and Kettlewell, P.J. (2018). A review of the evidence on welfare aspects of the transport of live animals. Defra Project AW0821. SRUC and University of Edinburgh.

Jones, T.A. (2003) Study to investigate the space above the head and shoulders of pigs and cattle when standing during transport. Defra Project AW0816 <http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=12041#RelatedDocuments>

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

**Please provide your comments in the text box below:**

There is currently insufficient research on how journey length interacts with headroom factors to impact animal welfare, to be able to determine if these proposals should cover both long and short journeys.

**29 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.**

**Please provide your comments in the text box below:**

The likely impact on the haulage industry of any proposed changes in specified headroom legal requirements will need to be fully assessed.

## **Sea Transport**

**30 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.**

**Please provide your comments in the text box below:**

AHDB are not yet able to support the proposal. The 2019 FAWC report recommendation that no animals should be transported by sea in a Force 6 or above does not appear to be supported by sufficient scientific evidence for all livestock species this proposal would cover, and the full impact of the proposal has not been calculated. We accept that there is some evidence that cattle and sheep may experience travel sickness, and there is more limited evidence for this in pigs, but this not just in relation to sea travel (Bradshaw, et al, 1999). In the case of breeding cattle, abortions have been linked to rough weather during sea travel (wind forces of 14 m/s, or Beaufort Wind Force 6 and greater) (Muller and von Herstein, 1982), but there are currently no studies showing this effect of rough weather on welfare to be the case in other species. However, most studies highlight that it is the issue of adequate ventilation to be the main concern for poor welfare during sea transport (SCAHAW, 2002; Phillips and Santurtun, 2013). There are limited studies giving evidence for the actual motion of sea transport impacting on welfare for other species, and most of the available studies on sea journeys relate to much longer trans-continental shipping (Phillips and Santurtun, 2013).

If animals are to be prevented from traveling by sea in rough weather contingency planning and provision of accommodation for livestock unable to travel will be required. Guidance on whether journeys are halted due to predicted or actual weather conditions will also be needed. There could be concerns for the welfare of animals that have already travelled not being able to complete journeys due to these proposals if they are subjected to additional unloading and loading and contingency lairage. Neither does the proposal consider the difference between short and longer sea journeys. Proper research and impact assessment is required as it will affect many British islands that are too small to have an on island abattoir where journey times are over one hour.

Refs:

Bradshaw, R.H., Randall, J.M., Forsling, M.L., Rodway, R., Goode, J.A., Brown, S.N. and Broom, D.M. 1999. Travel sickness and meat quality in pigs. *Animal Welfare*, 8, 3-14.

Muller, W. and Horsten, H. von (1982) Transport of breeding cattle by sea. *Veterinary Record*, 13; 110(7): 154-155.

Phillips, C.J.C. and Santurtun, E. (2013) The welfare of livestock transported by ship. *The Veterinary Journal*, 196: 309-314

Scientific Committee on Animal Health and Animal Welfare (SCAHAW) (2002). Report on the welfare of animals during transport. European Commission.

[https://ec.europa.eu/food/sites/food/files/safety/docs/sci-com\\_scah\\_out71\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/sci-com_scah_out71_en.pdf)

**31 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.**

**Please provide your comments in the text box below:**

If animals are to be prevented from traveling by sea in rough weather, and the recommendation from FAWC (2019) that the provision of venues to accommodate animals unable to travel, should be the responsibility of the owner/ transporter and should be inspected by APHA, then producers and haulage firms will incur additional costs, dependant on how many days animals are unable to be transported. Additional resource for inspections by APHA will also be required. This will require an impact assessment to be conducted.

## Exceptions

**32 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.**

**Please provide your comments in the text box below:**

The proposals described are insufficiently supported by robust peer-reviewed scientific evidence that they will deliver improved animal welfare outcomes. AHDB consider that this consultation does not sufficiently attempt to understand the possible unintended welfare consequences of the proposals. We are therefore unable to comment on additional exceptions.

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

**Please provide your comments in the text box below:**

As above, see response to Q28.

**34 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.**

**Please provide your comments in the text box below:**

There could be some consideration to using ongoing exceptions if the journey route is one frequently made, and there have been no recent welfare concerns/incidents and that it is reviewed within a specified time (i.e., to ensure best route, review that all necessary actions and protocols are in place to protect animal welfare as much as is practically possible). However, if these proposals were to be introduced there would be large-scale calls for immediate exemptions, as many of the proposals will be impractical or difficult to put in place, measure and enforce. There is a strong likelihood of greater risks to animal welfare being caused due to currently unconsidered unintended consequences, and of causing more welfare issues than they are designed to solve.

## Consultee Feedback on the Online Survey

**35 Overall, how satisfied are you with our online consultation tool?**

Satisfied

**Please give us any comments you have on the tool, including suggestions on how we could improve it:**

I was not able to upload a table of data as supporting evidence.