

Response ID ANON-U8J9-EFDR-H

Submitted to **Improvements to animal welfare in transport**

Submitted on **2021-02-22 09:12:31**

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:

Dan Crossley

3 What is your email address?

Email:

dan@foodethicscouncil.org

4 What is your organisation?

Organisation:

Food Ethics Council

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:

Yes, we agree that livestock export journeys for slaughter and fattening are unnecessary. The Conservative Party's 2019 manifesto stated that "We will end excessively long journeys for slaughter and fattening" and references "abolishing the cruel live shipment of animals". We support those commitments and believe the UK government should do too, quite simply because current practices are cruel and inhumane to animals. This is an opportunity to stop such practices and we believe legislative changes should be introduced as soon as possible to ensure these are no longer allowed. In tandem with this, the government should also do more to support the development of local abattoirs (and/ or mobile abattoirs), to reduce travel time for livestock within the UK and to make transport and slaughter more humane.

We understand that there are differences between Devolved administrations on this and we would encourage a consistent position, and a ban to be applied across the whole of Great Britain (we will leave others better qualified than us to comment on the implications in Northern Ireland).

Note - we are only commenting on farmed animals, rather than horses and other animals, in our response here. This is not because other animals are not important; it is purely because our interest and expertise relate to food and farming, hence including farmed animals.

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:

We believe that all export journeys for slaughter or fattening of livestock should be prohibited. As noted above, if animals are to be slaughtered, we would want to happen as close to where the animals are reared as possible. We would want any export not intended for breeding to be exported as the animal product (e.g. meat), not as a live animal.

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:

On animal welfare grounds, any live exports of any animals is undesirable. However, if live exports of poultry refer to very young chicks being transported by air, rather than by sea, i.e. quickly and being well cared for during their journeys, then we can understand making this an exception. This should be kept under careful review and welfare of the chicks be monitored carefully and regularly.

We do not oppose live animals being exported for breeding purposes (in small quantities), as long as they are transported in low numbers and in good conditions.

We would urge the government to put strict measures in place to ensure any exceptions to a ban can demonstrate that they are for these purposes (e.g. breeding), and are not simply being mislabelled as 'breeding', if in fact they are being exported for fattening or slaughter in order to get round the rules.

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:

N/A

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 comment. We will leave others with specific expertise to comment here.

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:

No comment. We will leave others with specific expertise to comment here.

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:

No comment. We will leave others with specific expertise to comment here.

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:

N/A

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:

In order to avoid additional stress to the animals, we would not want them to have to take more than one journey for fattening and more than one journey for slaughter (with appropriate rest stops, for the driver and the animals). If animals are to be slaughtered – as humanely as possible - we would want that to be as close to where the animals have been reared. Hence we believe it is important to support local and mobile abattoirs.

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 comment. We will leave others with specific expertise to comment here.

Thermal Conditions and Ventilation

17 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.

Please provide your comments in the text box below:

Yes, as animals should be transported in humane conditions, which include a comfortable temperature range, avoiding extremes of heat or cold.

18 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.

Please provide your comments in the text box below:

N/A

19 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.

Please provide your comments in the text box below:

Yes, as animals should be transported in humane conditions, which include a comfortable temperature range, avoiding extremes of heat or cold.

20 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.

Please provide your comments in the text box below:

N/A

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:

N/A

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:

No comment. We will leave others with specific expertise to comment here.

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:

Yes, this approach seems sensible. However, we will leave others with specific expertise to comment further.

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:

Yes, they should apply to all journeys (and measures should be introduced to avoid the need for long journeys in the first place). However, we will leave others with specific expertise to comment further.

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 support the introduction of minimum species-specific headroom requirements. We will leave others to comment on technical details.

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:

Yes, the same requirements should apply for all 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:

N/A

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:

Yes, animals should not be allowed to be transported in rough weather at sea or when there are very strong winds, as it could cause undue stress to the animals.

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:

N/A

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:

No, we do not believe there should be any 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:

N/A

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:

No, we do not believe this should be the case, as such an approach would be more liable to abuse.

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: