



Department
for Environment
Food & Rural Affairs



Llywodraeth Cymru
Welsh Government

Consultation on improvements to animal welfare in transport

December 2020

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We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Part 1 – Introduction

Context

1. The United Kingdom (UK) government has a manifesto commitment to end excessively long journeys for slaughter and fattening. This consultation is issued jointly by the UK and Welsh governments¹. The government is committed to the welfare of all animals and to making further improvements to animal welfare in transport. Now that the UK has left the European Union (EU), the government can explore alternative options to better protect animal welfare during transport.
2. The current rules aimed at protecting animal welfare in transport are derived from directly applicable EU law, Council Regulation (EC) No 1/2005². The Regulation sets out the requirements that anyone transporting animals in connection with an economic activity³ must comply with. There are growing concerns that the current requirements for the transport of animals do not reflect the latest scientific evidence on how best to protect animal welfare during transport.
3. The Department for Environment, Food and Rural Affairs (Defra) and the Devolved Administrations launched a Call for Evidence⁴ in 2018 on controlling live exports for slaughter and improving animal welfare during transport. The Farm Animal Welfare Committee⁵ (FAWC) were then asked to review this evidence and provide recommendations on improving the welfare of animals during transport. Scotland's Rural College (SRUC) and the University of Edinburgh conducted a systematic review of scientific research on the welfare of animals during transport and at markets. Evidence from the systematic review fed into FAWC's advice.
4. FAWC submitted their advice to Defra and the Devolved Administrations in 2019 which outlined concerns about how far and under what conditions animals can be transported under the current regulations. The FAWC advice identified several aspects of transport that negatively impact animal welfare, provided principles for best practice and recommended improvements to the current regulations on animal welfare during transport.

¹ The UK and Welsh governments are referred to as 'the government' hereafter unless otherwise stated.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32005R0001&from=en>; hereafter referred to as "the Regulation".

³ This is not limited to transport where an immediate exchange of money, goods or services takes place. Transport for commercial purposes includes, in particular, transport which directly or indirectly involves or aims at a financial gain.

⁴ <https://consult.defra.gov.uk/animal-health-and-welfare/live-exports-and-improving-welfare-in-transport/>

⁵ The Farm Animal Welfare Committee, known as the Animal Welfare Committee since 1 October 2019, was responsible for advising Defra and the Devolved Administrations in Scotland and Wales on the welfare of animals.

5. Our objective is to end excessively long journeys for slaughter and fattening, and to improve animal welfare during transport more generally.
6. The purpose of this consultation is to seek views on the proposal to end the export of livestock⁶ and horses⁷ (this will not apply to poultry) from England and Wales for slaughter and fattening. Exports from England and Wales would be prevented whether the animals originated from or were travelling through England or Wales. Exports for slaughter are exports direct to a slaughterhouse. Exports for fattening are exports where the animal is to be slaughtered within 6 months of arrival.
7. This consultation also seeks views on proposals to reduce maximum journey times for all journeys in England and Wales, and to improve the conditions of animal transport more generally. In summary, we are seeking views on the following proposed changes to animal welfare policy:
 - **Live animal exports:** The government proposes to end the export of livestock and horses for slaughter and fattening, whether travelling from or through England and Wales.
 - **Maximum journey times:** The government proposes to reduce current maximum journey times for all journeys.
 - **Temperature conditions and ventilation:** The government proposes introducing stricter requirements for all journeys during extreme external temperatures.
 - **Headroom height:** The government proposes implementing new headroom height requirements for all livestock and horse journeys.
 - **Sea transport:** The government proposes to prohibit all journeys by sea during Beaufort Wind Force of 6 or above.
 - **Short and long journeys:** For all the new requirements, we are proposing that these apply to both short and long journeys⁸.
 - **Exceptions:** There will be no exceptions to the proposals to end live animal exports for slaughter and fattening. However, the government wants to gather

⁶ Livestock in this consultation are defined as cattle, sheep, pigs and goats.

⁷ References to horses in this consultation include 'registered' and 'unregistered' horses unless otherwise stated. A registered horse or pony is one that is on the stud book of a recognised breed society or registered with an international organisation that manages equestrian competitions. Current regulations provide exemptions for the transport of registered horses, including transport without the requirement for a journey log, being restricted by water and feed intervals, journey times, rest periods and the transport of animals of four months or younger without being accompanied by their dam.

⁸ We are not proposing any changes to the current journey definitions. Short journeys are defined as being over 65km and up to, and including, eight hours in duration. Long journeys are defined as any journey which exceeds eight hours in duration.

views on potential exceptions to the other proposed changes to the regulations, provided there are sufficient welfare protections in place.

8. The government is also seeking views on basing space allowances for animals on allometric principles.
9. The government aims to understand the way in which these proposals may affect day to day animal movements and what potential exceptions might be considered in order to keep regulatory burdens to a minimum whilst protecting welfare. This consultation will help determine the government's policy in this area.

Scope

10. These policy proposals will require changes to legislation, however, we are proposing no changes to the existing scope of the current legislation on animal welfare in transport; these proposed measures would apply to all animals that are transported for economic reasons as currently defined in the Regulation. When proposals that are not species specific are outlined, these are intended to apply to livestock, poultry and horses unless otherwise stated. This consultation is seeking views in order to achieve an appropriate balance between the requirements and conditions applying to journeys to protect animal welfare, and regulatory impacts on animal keepers and businesses.
11. The proposals outlined in this consultation relate to England and Wales only. Animal welfare is a devolved matter and we will discuss the responses to this consultation with the Scottish government and Northern Ireland Executive.

Audience

12. Anyone may respond to the consultation. Those who have an interest include:
 - Animal welfare organisations;
 - Breeding associations;
 - Farming unions;
 - Livestock and genetics businesses;
 - Livestock and poultry farmers, and horse owners;
 - Livestock, poultry and horse traders;
 - Livestock or animal vehicle manufacturers;
 - Local authorities (LAs);
 - Show, competition and race organisers;
 - Trade bodies;
 - Transport companies; and
 - The veterinary profession.

Responding to the consultation

13. This consultation starts on 3 December 2020 and closes on 28 January 2021.
14. We would ask you to respond to the consultation questions using the online tool which can be found on Citizen Space at <https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/improvements-to-animal-welfare-in-transport>. However, responses could also be sent to Defra by email or post. Please state:
- **Your name**
 - **Your email address**
 - **Your organisation**

15. Enquiries and responses should be directed to AnimalWelfare.Consultations@defra.gov.uk, or

Consultation Coordinator, Defra

2nd Floor, Foss House, Kings Pool,

1-2 Peasholme Green,

York,

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16. If you would like to receive hard copies of the consultation documents, you may contact AnimalWelfare.Consultations@defra.gov.uk

After the consultation

17. Members of the public may ask for a copy of the responses under the Freedom of Information (FOI) legislation. If you do not want your response – including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer this will not count as a confidentiality request. Please explain why you need to keep the details confidential. We will take your responses into account if someone asks for this information under the FOI legislation. However, because of the law, we cannot promise that we will always be able to keep those details confidential.
18. We will summarise all responses once the consultation window is complete. This summary will include a list of names of organisations that respond but not people's personal names, addresses or other contact details.
19. This consultation is in line with the UK government's Consultation Principles. **Please note that a consultation period of 8 weeks applies.** More information on the UK

government's Consultation Principles can be found at:

<https://www.gov.uk/government/publications/consultation-principles-guidance>.

Part 2 – Consultation

Proposals

20. The policy objective is to end excessively long journeys for slaughter and fattening, and to improve animal welfare during transport more generally. The government believes that animals should only be transported when necessary and that journey durations should be minimised. The government believes that the following proposals will help achieve this outcome.

Live Animal Exports

21. Public concern regarding live animal exports has a long history and there have been a number of campaigns by animal welfare organisations since the 1990s, aiming either to end live animal exports for slaughter or to limit how far an animal can be transported on welfare grounds. More recently, Compassion in World Farming presented a petition in 2017 aiming to end long export journeys of live animals, which gained the support of a million European citizens⁹. In 2018, a petition advocating to end the export of live farm animals after the UK leaves the EU gained 100,752 signatures¹⁰.

22. The topic of live exports has also been raised repeatedly in Parliament. In 2016 Craig Mackinlay MP proposed a Private Members' Bill¹¹ to amend the Harbours, Docks and Piers Clauses Act 1847 to allow ports and local authorities to ban live exports. In October 2017 Theresa Villiers MP brought forward a Private Members' Bill¹² prohibiting live animal exports. In February 2018 live exports were the subject of a Westminster Hall debate¹³, led by Steve Double MP.

23. In response to the 2018 Call for Evidence, several concerns were raised by stakeholders in relation to live exports. The Call for Evidence found that 98% (247 of the 253) of the responses from the general public supported ending live exports. Many argued for ending exports for fattening as well as slaughter. In its 2019 report, FAWC recommended that animals should only be transported if it is 'absolutely necessary and that the most welfare considerate route is chosen'¹⁴.

24. The government recognises the long-standing public concern with live animals being exported for slaughter or fattening, in particular, the concern that these journeys are unnecessary. For this purpose the government considers that "exported for slaughter" should be defined as when an animal is exported direct to a slaughterhouse, and "exported for fattening" should be defined as when an animal is slaughtered soon after

⁹ <https://www.ciwf.org.uk/news/2017/09/1-million-strong-stopthetrucks-petition-hand-in>

¹⁰ <https://petition.parliament.uk/archived/petitions/200205>

¹¹ <https://services.parliament.uk/bills/2016-17/harboursdocksandpiersclausesact1847amendment.html>

¹² <https://services.parliament.uk/bills/2017-19/liveanimalexportsprohibition.html>

¹³ <https://hansard.parliament.uk/commons/2018-02-26/debates/39AF207E-7235-4D57-8723-54F6F87CC17B/LeavingTheEULiveFarmAnimalExports>

¹⁴ FAWC: Opinion on the Welfare of Animals during Transport, pp. 32

they have arrived at their destination, which we have defined as within 6 months of arrival. The government's view is that animals should only be transported if it is necessary and that the most welfare considerate route should be chosen. The government would prefer animals to be slaughtered close to the point of production and views these export journeys in particular as unnecessary given that the animals could be slaughtered nearer their point of production. This was one of the main issues identified by FAWC, who highlighted that animals are passing several abattoirs in the UK to be slaughtered overseas, leading to potential stress being experienced in the final stages of life¹⁵.

25. In the light of this, we are proposing to end the live export of livestock and horses going for slaughter and fattening travelling from or through England and Wales. Live export journeys for slaughter and fattening will not be allowed to depart from England or Wales for a destination outside the UK or transit through England or Wales on their way to a destination outside the UK. Therefore, live export journeys for slaughter and fattening beginning in Scotland, Northern Ireland or EU Member States such as the Republic of Ireland, that are destined for outside the UK, cannot transit through England or Wales. This proposal will not impact on necessary domestic livestock and horse movements between England, Northern Ireland, Scotland and Wales.
26. Under this proposal, the live export of animals for breeding will be allowed to continue. FAWC highlighted that breeding animals may be subject to export so that they can meet a requirement for improved genetic capabilities, and that these journeys should be considered as providing a more justifiable reason for an export journey, in comparison to those related to further finishing or slaughter where such actions could be carried out within the host country¹⁶. Furthermore, animals that are exported for breeding purposes are typically transported in very good conditions, with procedures put in place to ensure that the welfare of an animal is prioritised during the journey. For example, for transporting pigs, vehicles use air filtration systems to protect the animals from airborne disease and have full environmental control to ensure that the environment remains optimal. Animals exported for breeding are also typically able to live a full and healthy life once they arrive at the destination country, as opposed to animals enduring excessively long journeys before being slaughtered soon after arrival.
27. Equally, the live export of poultry will be allowed to continue. Significant poultry exports from the UK to the EU (excluding the Republic of Ireland) consist of day-old chicks transported for production on farm, with which there have been no major welfare concerns identified. This is in line with conclusions from the systematic review which highlighted that journeys of up to 24 hours may be still be appropriate for day-old chicks, due to energy and water reserves in the yolk sac¹⁷.

¹⁵ FAWC: Opinion on the Welfare of Animals during Transport, pp. 32

¹⁶ FAWC: Opinion on the Welfare of Animals during Transport, pp. 32

¹⁷ FAWC: Opinion on the Welfare of Animals during Transport, pp. 236-237

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

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.

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.

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.

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

Maximum Journey Times

28. Animals are transported for a variety of commercial purposes, including for breeding, fattening, production and slaughter but also for some races, competitions, shows, etc. The current regulations specify the maximum journey times for individual species, and rest periods that are required mid-journey. Under the current regulations, these journey times can all be repeated after the minimum 24-hour rest period is applied, counting as a single continuous journey.
29. The ability to repeat the cycle of journeys has led to concerns that, under the current regulations, there is no absolute maximum journey limit and that this raises significant animal welfare issues as animals could be exposed to excessively long journeys.
30. FAWC recommended that new maximum journey times based on scientific evidence should be applied, and that these times should be considered the absolute maximum¹⁸.
31. The government's view is that, when live animals are transported, journey times should be minimised where possible and that the current maximum permitted journey times should be reduced in order to reflect the latest scientific evidence. The government proposes new maximum journey times for all journeys based on FAWC's recommendations. The current definition of journey time will continue to apply, which includes loading, unloading and any rest periods¹⁹. This definition is widely understood

¹⁸ FAWC: Opinion on the Welfare of Animals during Transport, pp. 40

¹⁹ Journey time definition from the Regulation, Article 2 (j): *'journey' means the entire transport operation from the place of departure to the place of destination, including any unloading, accommodation and loading occurring at intermediate points in the journey.*

within the industry, and is used across Europe, so we do not propose to change it. Table 1 outlines the specific journey times being proposed.

32. The government is also proposing that after the maximum journey time is completed for most species, a minimum rest period of 48 hours would need to be observed at an approved control post, instead of the current 24 hours requirement. After this minimum 48-hour rest period, the journey could commence again as a new journey. For cattle, we are specifically proposing a minimum 7-day rest period, to account for cattle’s metabolic pathway recovery time taking a period of up to 7 days post-transport ²⁰. Table 2 outlines the new rest period requirements.
33. If any transporter wants to conduct a journey that goes beyond 21 hours for recently hatched chicks, cattle, sheep or other species not specifically identified in Table 1, consent will be required from the Animal and Plant Health Agency (APHA) to allow the journey to take place. Approval for these journeys will take into account the reasons as to why the journey needs to go beyond 21 hours, alternative options for the journey and additional requirements needed to ensure that animal welfare can be adequately maintained for the duration of the journey.

Table 1: Government’s proposal for maximum journey times for animals during transport

Species	New maximum journey time limits
Broiler chickens	4 hours
Pigs ²¹	18 hours
Newly weaned pigs	8 hours
Horses	12 hours
Calves (up to 9 months)	9 hours
Recently hatched chicks ²²	21 hours (24 hours with consent from APHA).
Cattle	21 hours, (29 hours with consent from APHA).
Sheep	21 hours (48 hours with consent from APHA).
All other animals (until scientific evidence is provided, no animal should be exposed to journeys longer than 21 hours).	21 hours

²⁰ FAWC: Opinion on the Welfare of Animals during Transport, pp. 47.

²¹ Pigs should receive continuous water provision when on longer journeys (within the recommended maximum journey time recommendations).

²² A maximum journey time of 24 hours being acceptable in the first 72 hours post-hatching.

Table 2: Government’s proposal for minimum post-journey rest periods

Species	New minimum post-journey rest periods
Cattle	7 days
All other animals	48 hours

34. We would be interested to hear if you think there should be any exceptions to these maximum journey times and, if so, why. We would also welcome views on what, if any, additional measures should be required to protect animal welfare if exceptions were permitted.

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.

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

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

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.

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

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.

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

Thermal Conditions and Ventilation

35. Thermal conditions and ventilation are a key aspect of welfare in transport and extreme temperatures and poor ventilation can cause animal welfare issues to arise. Animals being transported are at risk of welfare issues arising due to sudden or severe changes in temperature during very hot or very cold weather and this can affect mortality rates if internal temperatures inside the vehicles cannot be maintained.

36. The current regulations specify that ventilation on means of road transport used for long journeys must be able to maintain a temperature between 5°C and 30°C. The regulations do not currently prevent transporters from transporting animals on long journeys when the external temperature is close to or outside of this range and provide a tolerance of $\pm 5^\circ\text{C}$ depending on the external temperature. The current regulations also do not recognise that different animals may be more susceptible to the cold or the heat, although transport guides do provide guidelines for temperature ranges for different species.
37. In addition to this, there is no requirement for vehicles on short journeys (below 12 hours in the UK) to have ventilation or temperature control equipment installed so there are no current thermal requirements. However, data from the Food Standards Agency (FSA) shows a significant increase in animals, especially poultry, which are dead on arrival (DOA) during hot and cold weather.
38. FAWC highlighted that more research and evidence is required in order to determine the acceptable temperature ranges for the different species and classes of animals²³. FAWC did suggest species specific temperature ranges for cattle, sheep, pigs and poultry that could be used as guides for future policy reform²⁴. For species not included in these guides, FAWC advised that the current regulations should be applied²⁵.
39. The government recognises the welfare concerns that arise due to thermal conditions and ventilation and wants to ensure that our policy reforms reflect the latest evidence and expert understanding where available. We agree with FAWC that more research and evidence is required to determine acceptable temperature ranges for different species and classes of animals before future reforms incorporate specific requirements for all species.
40. In the light of this, we are proposing that no livestock or horse journeys will be allowed to take place if the forecast external temperature for the journey is outside of a temperature range of 5-30°C, unless the vehicle is able to regulate the internal temperature within a 5-30°C temperature range for the duration of the journey by means of a thermo-regulation system. This will apply to both short and long journeys.
41. For vulnerable groups of animals, however, we propose that a more limited temperature range should apply. We recognise the specific concerns that have been identified in relation to the impacts that extreme temperature can have on poultry. FSA data has illustrated increased poultry DOAs during periods of very hot and cold temperatures. The systematic review also highlights that DOAs for commercial broiler transport have been associated with higher temperatures in transit²⁶.

²³ FAWC: Opinion on the Welfare of Animals during Transport, pp. 39

²⁴ FAWC: Opinion on the Welfare of Animals during Transport, Appendix C

²⁵ FAWC: Opinion on the Welfare of Animals during Transport, pp. 39

²⁶ FAWC: Opinion on the Welfare of Animals during Transport, pp.274

42. To address this, we are proposing that no poultry journeys will be allowed to take place if the forecast external temperature for the journey is outside of a temperature range of 5-25°C²⁷, unless the vehicle is able to regulate the internal temperature within a 5-25°C temperature range for the duration of the journey by means of a thermo-regulation system. This will apply to both short and long journeys.

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 5-25°C, 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 5-25°C? Please explain your views.

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 5-25°C? Please explain any impacts provided.

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 5-30°C, 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 5-30°C? Please explain your views.

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 5-30°C? Please explain any impacts provided.

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.

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

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?

²⁷ We have chosen this upper limit after considering the species-specific recommendations in the FAWC advice and the research conducted in the systematic review. Appendix C of the FAWC advice suggests an upper temperature limit of 28°C for end of lay birds and broilers. The systematic review highlighted that for newly hatched chicks an optimal temperature range of between 24.5-25°C and 63-60% relative humidity is recommended for chicks transported at commercial stocking density. The systematic review also illustrated that broiler chickens can experience increased weight loss (through evaporation) above temperatures of 24°C, indicating increased heat stress at higher temperatures. The systematic review also highlighted that temperatures between 22-25°C were deemed as high for transported broilers, 25-28°C as critical and anything above 29°C as lethal.

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

Space Allowances

43. Space allowances are specified in the current regulations for livestock, poultry and horses. FAWC have previously advised the government on the importance of space allowance in maintaining animal welfare during transport in 2013²⁸. High stocking density can lead to negative impacts on animal welfare, including animals finding it difficult to regulate their body temperatures. High stocking density can also lead to increased risk of trapping, compression, 'stepping on', or physical damage.
44. In its 2019 report, FAWC recommended that space allowances should be calculated according to an allometric system that relates size to body weight and provided specific equations for cattle and sheep²⁹. This advice is consistent with their 2013 report on the same issue. The area occupied by an animal does not change linearly as it grows in weight, therefore, if an animal is twice the weight of another it will not take up twice the area. The equation below describes this relationship³⁰.

$$\text{Area (m}^2\text{)} = k \text{ (constant value)} \times \text{animal weight (kg)}^{\frac{2}{3}}$$

45. The relationship as illustrated above is allometric as the exponent which is applied to the animal's weight is not equal to one. In its 2013 report, FAWC highlighted that most animal growth is allometric, with proportional measurements of body parts changing with growth (as distinct from isometric growth, with body parts staying proportionally the same)³¹.
46. Therefore, according to the above relationship, one animal twice the weight of another would need 59% more space. FAWC stated that this non-linear relationship is important e.g. an area that is just large enough for 10 animals each weighing 60kg will not be large enough for 20 animals each weighing 30kg, even though the total weight is the same at 600kg³².
47. In its 2013 report, FAWC also emphasised that space allowances based on allometric principles would need to be based on credible estimates of k , which should take into account:
- The type of animal (e.g. the k value for fully fleeced sheep will be greater than that for shorn sheep as shorn sheep of the same weight can occupy slightly less area than those with thick fleeces);

²⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/324500/FAWC_advice_on_space_and_headroom_allowances_for_transport_of_farm_animals.pdf

²⁹ FAWC: Opinion on the Welfare of Animals during Transport, pp. 37

³⁰ FAWC advice on space and headroom allowances for transport of farm animals, point 30

³¹ FAWC advice on space and headroom allowances for transport of farm animals, point 31

³² FAWC advice on space and headroom allowances for transport of farm animals, point 34

- The extent to which different types of animals can be packed (e.g. choosing a lower k value will result in more packing); and
- The type of journey that is undertaken (e.g. it might be more important for animals to lie down on a long journey than on a short one, requiring more space and a higher k value).

48. Once credible estimates of k are developed for different animal species, it would be possible to produce tables of recommended space allowances for different types of animals over appropriate weight ranges.

49. The government recognises the welfare concerns connected to space allowances and accepts FAWC's recommendation that, where possible, we should move towards using allometric principles to establish space allowances for all animals. We want to work with you in order to understand your views on this approach to calculating space allowances, how this would relate to both short and long journeys and how this could be implemented in practical terms.

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

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.

Headroom Allowances

50. In its 2019 report, FAWC also noted that it is important that animals other than poultry (poultry are transported in crates with specific requirements and constraints) have enough head space to stand in their natural position, which will ensure that there is adequate ventilation and will prevent any injury or suffering to the animals. This reflects previous advice in their 2013 report on the same issue³³.

51. The current regulations state that 'sufficient space shall be provided inside the animals' compartment and at each of its levels to ensure that there is adequate ventilation above the animals when they are in a naturally standing position, without on any account hindering their natural movement'. FAWC highlighted that the concern with this is that there are no figures to further define what 'sufficient' means and that the natural standing position will vary depending on the type of animal and nature of the journey.³⁴

52. The government recognises the welfare concerns connected to headroom allowances. We agree that headroom allowances should be developed in a manner that takes into account species-specific requirements. In the light of this, we are proposing to

³³ FAWC advice on space and headroom allowances for transport of farm animals

³⁴ FAWC advice on space and headroom allowances for transport of farm animals, points 51 and 52.

implement headroom heights for specific species as suggested by FAWC, outlined in Table 3 below³⁵.

Table 3: Government proposals for headroom heights for different species (height above full standing head height)

Species	Recommendations
Dairy Cattle	20cm
Beef Cattle	30cm
Sheep	22cm
Pigs	9cm
All other animals (excluding poultry)	20cm above the head

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

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

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.

Sea Transport

53. All forms of transportation have the potential to adversely affect an animal's welfare. In its 2019 report, FAWC highlighted that new evidence is indicating that this is particularly the case for sea transport³⁶. For example, motion at sea, including side-to-side or up-and-down movements can cause increased stress in sheep and pigs. FAWC also highlighted that conditions where the Beaufort Wind Force is 6 or above can cause motion sickness in cattle and sheep³⁷.

54. There has been limited research conducted on the acceptable maximum journey duration at sea. FAWC recommended that reforms to animal welfare policy should

³⁵ FAWC: Opinion on the Welfare of Animals during Transport, pp. 38

³⁶ FAWC: Opinion on the Welfare of Animals during Transport, pp. 43

³⁷ FAWC: Opinion on the Welfare of Animals during Transport, pp. 43

prevent animals from being transported in severe weather and sea conditions where increased side-to-side or up-and-down motions may occur³⁸.

55. FAWC recommended that no animals should be transported over the sea during Beaufort Wind Force of 6 or above³⁹. In the event of poor sea conditions, contingency plans and the provision of venues to accommodate animals should be arranged by the owner or transporter⁴⁰.
56. The government recognises the concerns that have been raised in the FAWC advice on the sea transport of animals. Therefore, the government is proposing that live animal journeys will no longer be able to take place by sea during Beaufort Wind Force of 6 or above.
57. Transporters are currently asked to submit contingency plans that are inspected by APHA before conducting their journey. Under the section, '*What action will you take in the event of... weather conditions delay the journey?*'⁴¹ of the contingency plan form that is inspected by APHA, transporters will need to state what actions will occur in the case of Beaufort Wind Force of 6 or above.

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.

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.

Exceptions

58. There will be no exceptions to ending live animal exports for slaughter and fattening. However, the government wishes to explore whether there should be any exceptions to the other proposals outlined in this consultation. For example, reasons for applying for permission to exceed proposed maximum journey times might include:
- The transport conditions are of a significantly higher standard than the regulations stipulate e.g. improved stocking density or temperature control; or
 - The animals being transported are accompanied by a vet.

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.

³⁸ FAWC: Opinion on the Welfare of Animals during Transport, pp. 43

³⁹ FAWC: Opinion on the Welfare of Animals during Transport, pp. 43

⁴⁰ FAWC: Opinion on the Welfare of Animals during Transport, pp. 43

⁴¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780133/WIT27.pdf

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

59. Furthermore, depending on the reasons for applying for an exception, applications could be made for permission to apply the exception on an ongoing basis or for a limited time.

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.

Impact of proposals

60. A provisional impact assessment has been prepared to measure the potential impacts on businesses as a result of any proposals to introduce changes to legislation on animal welfare in transport. This will be made available during the consultation period.

Legal status

61. These policy proposals will require changes to legislation.

Glossary

APHA – The Animal and Plant Health Agency

BSE – Bovine Spongiform Encephalopathy

CoC – Certificate of Competence

Defra – The Department for Environment, Food and Rural Affairs

DOA – Dead on Arrival

EC – Council Regulation

EU – European Union

FAWC – The Farm Animal Welfare Committee (now Animal Welfare Committee)

FOI – Freedom of Information

FSA – Food Standards Agency

LA – Local Authorities

MP – Member of Parliament

SRUC – Scotland's Rural College

UK – United Kingdom