

Response ID ANON-M5N9-4CR3-5

Submitted to **Farm Animal Welfare Committee's opinion on the welfare of animals during transport: consultation**

Submitted on **2021-02-25 14:53:02**

Questions

1 Do you agree with the Farm Animal Welfare Committee (FAWC) recommendations for future research and the Scottish Government's position and proposed course of action?

Yes

Please provide any further relevant information.:

It is clearly important to keep improving our knowledge base regarding welfare in transport but also to focus research to answer real-world questions in a UK context - so for example using real-time biochemical monitoring of animals on sea journeys to determine their responses.

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

Yes

Please provide any further relevant information.:

This question is much narrower than the issues raised in the consultation response

There is no economic justification for exporting live animals for fattening or slaughter. Livestock systems should be designed to make this unnecessary. The Scottish Government should make the current suspension of live calf exports permanent.

The calves involved in the live export trade are mainly male dairy calves. It has previously been argued that if male dairy calves are not exported, they would need to be euthanised at birth. This is no longer the case. The commercial viability of male dairy calves has increased enormously in recent years, due to concerted efforts of industry and related groups, particularly under the GB Calf Health and Welfare Group (CHAWG).

Dairy producers are increasingly using sexed semen to produce female dairy replacement calves, so that many fewer male dairy calves are born. Calves to be reared for meat are increasingly dairy/beef crosses which are more economical to rear. AHDB data indicates an accelerating increase in purchases of sexed semen to produce dairy animals from 12.3% of semen sales in 2012 to 51.3% in 2020. This trend has recently picked up real momentum and is expected to continue.

Retailers including M&S, Co-operative, Waitrose and Morrisons have schemes in place to help ensure rearing dairy-sired bull calves is economically possible and the Arla UK 360 programme announced that from January 2021 no healthy calf will be killed before 8 weeks of age. Responsible breeding programmes are being implemented, to ensure that no calves are born for which there is no market. From Autumn 2021, Red Tractor Dairy scheme standards require that breeding programmes are in place and that there is no routine euthanasia of calves. As part of the GB Dairy Calf Strategy, retailers, food service and processors are being encouraged to support Britain's beef sector by committing to source British beef.

The excellent cross-industry work of CHAWG and the GB Dairy Calf Strategy has led to a significant and rapidly growing internal market for male calves which, along with the rapid reduction in the number of male dairy calves being born due to the use of sexed semen, has helped to facilitate the very welcome industry commitment to eliminate euthanasia of calves by 2023. As such, it is unnecessary for male calves to be exported or euthanised at birth.

Exporting animals (rather than genetic material) for breeding should be exceptional and require prior permission.

We are pleased to see Scottish Government interest in mobile abattoirs, a subject which has been discussed for many years. We would suggest that consideration should also be given to a much more planned and co-operative approach to local slaughter, as part both of improving animal welfare and strengthening local and regional food economies.

In terms of technology, consideration should be given to a network of modular part-time abattoirs with a mobile and well-paid workforce covering a number of parishes. Veterinary supervision and support can be provided remotely, reducing the costs and the difficulties of recruiting vets.

This should be one of the key issues covered in the development of a 'national strategy for local food' which was announced in the 2020 Programme for Government, and should be given specific consideration by HIE and SOSE.

More generally, a planned approach to the slaughter of fat lambs should be used to reduce the high percentage of Scottish lambs which have to travel hundreds of miles to slaughter in England.

There is a reasonable requirement for store lambs and cattle to travel to better ground in the South and East for fattening. However again this should generally be a one-off journey for those animals with a presumption against further movement to another farm before slaughter. Multiple moves by a single animal in its lifetime should be exceptional, and not part of good professional practice. Reducing animal movements has co-benefits not only in terms of welfare at loading and in transport but also in terms of disease transmission.

There should also be a presumption against going through a market: technology allows for online marketing as well as stress-free inspection and discussion between vendor and purchaser. The stress and additional journeys involved in the current system is an avoidable legacy from the past century.

3 Do you agree with the Scottish Government's position on determining fitness for transport and proposed course of action?

No

Please provide any further relevant information.:

This comes across as a little complacent. Duty of care, and responsibility for animal welfare is a core part of farming's professional ethos, and should form a core part of continuing professional development for all livestock (including fish) farmers.

Research on animal welfare and animal sentience continues to evolve and all livestock farmers (including those with small herds/flocks) should be required to update their knowledge and understanding on a regular basis as part of their licence to keep livestock

As well as sending out guidance updates to farmers on an occasional basis, a more proactive approach would have been helpful in underlining the importance of welfare in transport. For example the animal movement form that goes to SAMU or the ScotEid form could have a specific section to confirm requirements being met - eg below xkg/m², length of journey, ambient temperature, no incidents of concern at loading/unloading. Even a 'thank you for moving your animals carefully' bit would help. This is not about catching farmers out, but simply providing a prompt to remember the importance of doing this right.

4 Do you agree that there should be no distinction between registered and unregistered horses in future legislation on welfare during transport?

Don't Know

Please provide any further relevant information.:

5 Do you agree with the Scottish Government's position on the means of transport and proposed course of action?

Yes

Please provide any further relevant information.:

Accelerometers and vehicle inspections are a way of trying to inspect-in animal welfare. We should be starting by designing out journeys, and then focus on professional ethos, values and training. Inspecting everyone's horse box and livestock trailer tells you nothing about what the condition of that vehicle will be the following week or the following month and it tells you nothing about the way animals were loaded/unloaded, the temperature etc etc.

Retro-fitting accelerometers to everyone's vehicle also sounds disproportionate. Who would review the data supplied, cross-matching the journey made to take animals to the abattoir with the manual SAMU data to distinguish it from the journey the same vehicle made to the shops later that day? see Q11

6 Do you agree with the Scottish Government's position on the maximum time an animal may spend at market and proposed course of action?

Yes

Please provide any further relevant information.:

As per above, we are unconvinced that physical markets are good for animals or necessary for the livestock sector. But while we still have them they should be licensed for animal welfare and there should be a maximum time for animals to remain at the market, depending on the quality and scale of holding facilities

7 Do you agree with the Scottish Government's position on space allowances for animals in transport and proposed course of action?

No

Please provide any further relevant information.:

It doesn't seem complicated to provide maximum densities for transport in kg/m² since other stocking densities use that approach. Of course animals should have reasonable headroom

8 Do you agree with the Scottish Government's position on transport practices and proposed course of action?

Yes

Please provide any further relevant information.:

We agree that regulations should not distinguish on the basis of the purpose of the journey since that is irrelevant to the experience of the animal.

We also agree that the transport of companion animals falls outwith these regulations (and suggest it may be outside the competence of FAWC). We assume that more general legislation covers mistreatment of companion animals (eg prosecution of people who leave their dogs in hot cars).

9 Do you agree with the Scottish Government's position on thermal conditions and ventilation for animals in transport and proposed course of action?

Yes

Please provide any further relevant information.:

Again, we agree that the temperature outside is a poor guide to the temperature inside and commercial vehicles should be able to monitor and control temperatures if they have to travel in extreme weather conditions. For smaller operators without sophisticated vehicles, guidance should be to avoid transporting all animals in hot weather, and to avoid transporting small animals without protection in cold weather.

10 Do you agree with the Scottish Government's position on maximum journey length and proposed course of action?

Yes

Please provide any further relevant information.:

It may be necessary in some systems to move animals for fattening or slaughter from an island to the mainland, and in each of these predictable cases there should be a clear system to which everyone adheres for ensuring animal welfare on long journeys.

It is difficult to see any justification for a system which necessitates moving unweaned animals long distances. This raises a wider question about farm animal welfare requirements which should apply not just at an individual site but to a production system as a whole. Systems which are predicated on multiple movements and long journeys are not welfare-compliant.

11 Do you agree with the Scottish Government's position on mid-journey breaks and proposed course of action?

Yes

Please provide any further relevant information.:

12 Do you agree with the recommendation that anyone who transports livestock, poultry or horses should require transporter authorisation and a Certificate of Competence, including if they only transport animals on short journeys?

Yes

Please provide any further relevant information.:

Farmers with on-farm butcheries may transport animals for slaughter very regularly over many years. If they happen to be within 65km of an abattoir they do not have to show competence. This is not a hugely onerous requirement but does provide a safeguard and an opportunity to ensure that those transporting animals are familiar with current regulations.

13 Do you agree with the Scottish Government's position on transportation of animals by sea and proposed course of action?

No

Please provide any further relevant information.:

'Neutral time' is a specious concept, and unnecessary.

There are a limited number of specifiable sea routes which animals in Scotland need to make as part of sustainable high-welfare systems. As stated above, journeys to slaughter should be minimised by the provision of (and requirement to use) local modular abattoirs. However, some may still be necessary: and some animals will need to travel to the mainland for fattening at a certain point in their lifecycle.

For these routes, specific welfare-maximising protocols should be developed and agreed, covering all aspects of the journey, including rests, bad weather contingencies etc. and movements made which comply with this protocol are approved.

14 Do you agree the Scottish Government should consider the proposed review on research into transportation by rail or air alongside other research priorities?

Don't Know

Please provide any further relevant information.:

15 Do you agree with the Scottish Government's position on the collection and use of feedback to identify welfare risks in transport and proposed course of action?

Yes

Please provide any further relevant information.:

16 Do you agree with the Scottish Government's position on the enforcement of welfare of animals in transport and proposed course of action?

Yes

Please provide any further relevant information.:

17 Do you agree with the Scottish Government's position on post-export protection of animal welfare and proposed course of action?

No

Please provide any further relevant information.:

We do not see the need for live farm animals from Scotland to be exported outside the UK. If they are being exported, we support FAWC's recommendation of equivalence of welfare standards being a requirement. This is a stronger safeguard than Scottish Government's wording of 'unacceptable' which is a subjective term.

We also argue that the duty of care extends beyond the immediate country of export. Calves have been exported from the UK to other EU countries and then onwards to countries outside the EU not covered by the same animal welfare protections.

Finally - and as there isn't an 'any other comments' box - we recognise that businesses need to adjust and support is needed to develop local abattoir facilities, provide rest areas and so on. These should be seen as an integral part of our Good Food Nation approach and budget should be made available as part of the new farm support arrangements to underpin necessary transitions

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Nourish Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very dissatisfied

Please enter comments here.:

The consultation document did not set out the issues clearly. The FAWC recommendations were not all put in context. The implications for example of changing the arrangements for sea journeys could have been illustrated.

Some of the language used to describe the Scottish Government's position was hard to decipher, and there was an effort to sidestep the issue of live calf exports.

These are important and in some cases emotive issues and if responses to a written consultation are a key part of shaping policy then a clearer more rounded document would have been helpful

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: