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Animal Concern Ltd is a Registered Scottish Charity (No. SC050422) and a registered non-profit
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Established in 1988 as Animal Concern (Scotland) Ltd.
It incorporates the Scottish Anti-Vivisection Society which was founded in 1876.

Below is the submission from Animal Concern to the UK Government consultation on plans to ban live export of animals for fattening and slaughter and to increase overall welfare standards in the transport of liver animals. Many will argue that we should simply campaign against all transport and slaughter of animals but, despite the recent surge towards veganism, we have to be realistic and accept that live transport and slaughter will exist for years to come. It would be remiss not to try and at least reduce the suffering on the way towards the ultimate goal of ending that suffering.

The consultation can be found on this link and is open for submissions until 25th February 2021:
<https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/improvements-to-animal-welfare-in-transport/>

It will take circa 60 to 90 minutes to complete. Just put N/A in the box of any questions you don't want to answer. Remember these questionnaire style consultations can be a bit leading and can influence the result. If you have something to say act like a politician and don't answer the specific question but put what you want to say in the box. Our answers will give you some ideas but try not to just copy them, answer in your own words.

Qs 1 to 4 are for identification purposes.

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

If we must export for the meat trade we should export finished, slaughtered and prepared or fully butchered carcasses and not live animals. The journey can in itself be stressful and cause welfare problems and once out of the UK we have no control over welfare standards in transit, in the finishing units and at slaughter. All of these could fall well below UK welfare standards.

It also makes economic and environmental sense to export finished chilled product as it carries a much higher financial value, avoids any welfare problems due to delays at customs and uses far fewer vehicles to transport.

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 see my answer to 5 above. I would ban all live export for fattening and slaughter no matter the time between export and slaughter.

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.

In addition to my answers above I would add that having had personal experience of the welfare failings in transporting poultry even short distances to slaughter I would make no exemptions for poultry. I would ban all live export for fattening and slaughter no matter the time between export and slaughter. I would also ban the export of animals going for breeding or production that will not be slaughtered within 6 months as this does not avoid the suffering and stress of long-distance transportation and we would have no control over welfare standards at destination.

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.

It would save us money as we could stop campaigning against this cruel practise.

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

We would spend more time campaigning for more high standard local abattoirs throughout the UK thus reducing live transport journey times within this country.

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.

ANSWER TO Qs 11 to 16: Not applicable as we want a total ban on both live exports and journeys other than short journeys in the U.K..

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.

We want a total ban on both live exports and journeys other than short journeys on the U.K. but agree that this measure should be made law to increase welfare standards during short journeys in the U.K..

18: 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.

We want a total ban on both live exports and journeys other than short journeys in the U.K. but agree that this measure should be made law to increase welfare standards during short journeys in the U.K..

20: 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.

I'm no expert but would have thought that all animals have the potential to suffer if transported under unsuitable temperature conditions. It would surely vary even within species. For instance, a load of fully fleeced sheep and a load of recently shorn lambs would need very different transport temperatures for their welfare and safety.

22/23: 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.

You don't need evidence just old-fashioned common sense to know that you shouldn't be transporting animals during blizzards, heatwaves or hurricanes. The best step is to check the weather forecast before taking the decision to load the animals onto the transporter.

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

Again I'm referring to short domestic journeys as we want long-haul and exports banned. Yes so long as you consider all factors including size, natural behaviour and how the animals behave while being transported.

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.

Short only as we want long journeys banned.

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

Makes sense. You wouldn't transport a giraffe in a cat box.

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

29. N/A.

Short only as we want long journeys banned.

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.

Animals should only be transported to slaughter on domestic ferries between islands and the mainland when there is no alternative such as a local abattoir on the island of origin. I'm not sure how strong Beaufort Wind Force 6 is but animals should not be transported by ferry during strong winds or when strong winds are forecast.

31: N/A

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.

There should be no exceptions to animal welfare provisions.

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

There should be no exceptions to animal welfare provisions.

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.

There should be no exceptions to animal welfare provisions.

ENDS