



Department  
for Environment  
Food & Rural Affairs



Llywodraeth Cymru  
Welsh Government

# Improvements to animal welfare in transport

Summary of responses and government response

Date: August 2021

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# Foreword from the Secretary of State and the Minister for Rural Affairs and North Wales, and Trefnydd

The welfare of all animals, including in transport, is a real priority for both the UK Government and the Welsh Government. The UK Government has a manifesto commitment to end excessively long journeys for slaughter and fattening, which we are taking forward through our Kept Animals Bill. Now we have left the EU, we have the opportunity to look at alternative methods to better protect animal welfare during transport.

The Farm Animal Welfare Committee (FAWC, now known as the Animal Welfare Committee) report in 2019 identified several aspects of transport that have a detrimental effect on animal welfare. They made a series of recommendations to the current regulations on animal welfare during transport. A Welsh Government response to this paper was published in 2020.

Following the findings in this report, we have looked at improvements to animal welfare in transport, including maximum journey times, thermal conditions and ventilation, space and headroom allowances and sea transport. We have received a wide range of views to our consultation. We have listened to those views, and will continue to work with industry, NGOs and others to identify priorities where the evidence is clear and in other cases to explore some of the issues and evidence together in more detail. I want us to work together to develop practical solutions that generate the good welfare outcomes we all want to see.

This is a big step, but where the evidence is clear we must act. We want to work with industry to co-design solutions to achieve high welfare outcomes and help them make this transition.

**The Rt Hon George Eustice MP**  
Secretary of State for Environment,  
Food and Rural Affairs

**Lesley Griffiths MS**  
Minister for Rural Affairs and North  
Wales, and Trefnydd

# Part 1: Summary of responses

## Introduction

This document provides a summary of responses to the consultation, which was issued jointly by the UK and Welsh governments<sup>1</sup>, on improvements to animal welfare in transport. Analysis of responses was undertaken by Defra. This summary is issued jointly by UK and Welsh governments.

The purpose of this consultation was to seek views on the proposal to end the export of livestock and horses<sup>2</sup> from England and Wales for slaughter and fattening.

The consultation also sought views on proposals to improve the conditions of animal transport more generally. In summary, we invited views on the following proposed changes to animal welfare policy:

- Live animal exports: The government proposed 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 proposed to reduce current maximum journey times for all journeys.
- Temperature conditions and ventilation: The government proposed introducing stricter requirements for all journeys during extreme external temperatures.
- Headroom height: The government proposed implementing new headroom height requirements for all livestock and horse journeys.
- Sea transport: The government proposed to prohibit all journeys by sea during Beaufort Wind Force of 6 or above.
- Short and long journeys: We proposed that all the new requirements should apply to both short and long journeys, but not to journeys under 65 km, such as local farm to farm movements. We did not propose any changes to the current journey definitions: short journeys are defined as being over 65km and up to, and including, eight hours in duration; and long journeys are defined as any journey which exceeds eight hours in duration.
- Exceptions: There will be no exceptions to the proposals to end live animal exports for slaughter and fattening. However, the government wanted to gather views on potential exceptions to the other proposed changes to the regulations, provided there are sufficient welfare protections in place.
- The government also sought views on basing space allowances for animals on allometric principles.

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<sup>1</sup> The UK and Welsh governments are referred hereafter as ‘the government’ unless otherwise stated.

<sup>2</sup> The term ‘horses’ is used throughout this document to refer to all equines.

The consultation ran for 12 weeks, from 3 December 2020 to 25 February 2021.

## Number of responses

In total 11,395 responses to the consultation were received. These were made up of:

- 3,766 individual responses
- 7,629 campaign responses

The individual responses comprised:

- 3,507 responses through the online questionnaire on Citizen Space.
- 259 responses via email and post.

The campaign responses consisted of the following, detailed in the box below:

- 7,445 identical responses from supporters of the RSPCA (7,358 sent via email and 87 through the online questionnaire).
- 184 identical responses from supporters of Animal Aid (20 sent via email and 164 through the online questionnaire).
- 1 petition response from supporters of Compassion in World Farming consisting of 111,295 signatures.

### **RSPCA campaign response – 7,445 responses**

The RSPCA campaign response addressed questions 1-3 concerning live exports, question 6 concerning maximum journey times and question 28 concerning exceptions to the proposals.

The response stated that long distance live animal export journeys cause welfare issues including exhaustion, injury, hunger, dehydration and heat stress. It also expressed concern that once animals are exported, they could be kept in conditions and slaughtered using methods that are illegal in the UK.

The response stated that the export of animals for fattening should be prohibited, regardless of any time period to slaughter after arrival.

The response agreed that there should be an exception for export journeys for breeding animals but not for poultry live exports.

With regard to maximum journey times, the response stated that these should be kept to an absolute minimum and referred to the RSPCA's species-specific higher welfare standards.

The final comment was to state that there should be no other exceptions to the proposals.

### **Animal Aid campaign response – 184 responses**

The Animal Aid campaign response addressed 20 of the 30 consultation questions.

The response stated there should be a total ban on live exports with no exceptions.

The response stated that animals should not be transported at all but, if they have to be, the absolute maximum journey time should be 8 hours, and exemptions to that should only be for shorter journey times for particular animals, depending on age, species and other factors.

The response welcomed measures to ensure that animals are never transported outside of safe, defined temperature limits. However, it stated that there should also be some consideration of the temperatures that the animals will be exposed to during the course of the journey.

The campaign was generally supportive of proposals for space allowances following allometric principles but expressed concern that the proposed species-specific headroom requirements were insufficient.

Regarding conditions for sea crossings, as per the views on temperature range proposals, the response stated that there needs to be a clear emphasis on the likely conditions during a crossing rather than solely at the start of the journey.

### **Compassion in World Farming petition response - 111,295 signatures**

The petition response from supporters of Compassion in World Farming called for the UK Government to ban the live export of all animals destined for slaughter and fattening.

A number of other organisations, such as the National Farmers' Union, encouraged their supporters to respond to the consultation, either through the online survey found on Citizen Space or by providing an email response. These responses had been substantially personalised by individual respondents, so have been assessed individually.

Where respondents answered the specific consultation questions, these have been included in the figures provided throughout this document. Where respondents provided more general comments, their views have been reflected in the broader analysis and in picking out key themes from all the comments.

## **Demographics**

Among the individual responses, we received broadly equal numbers of responses from the general public with 1,709 responses, and farmers with 1,696 responses. The next most

represented sectors were transporters with 51 responses, industry and membership bodies with 50 responses and non-governmental organisations with 33 responses. Other respondents included livestock auctioneers and markets, food producers and slaughterhouses, vets and scientific researchers.

## Headline figures

- 87% of respondents agreed (9,397 people in total, 79% of whom were RSPCA campaign responses) that livestock and horse export journeys for slaughter and fattening are unnecessary.
- We received polarised responses to the maximum journey times proposals, with farming industry respondents raising concerns that existing journeys could not take place in the proposed times, and animal welfare organisations proposing shorter maximum journey times. Overall 5% of respondents agreed with the proposed times. Results include the RSPCA campaign response.
- 55% of respondents agreed that long and short journeys of poultry with an external temperature outside 5-25°C should be prohibited unless thermoregulation is applied.
- Responses to the proposal that livestock journeys with an external temperature outside 5-30°C should be prohibited unless thermoregulation is applied came from opposing viewpoints. Industry representatives felt the range was too restrictive whilst many animal welfare organisations proposed narrower or species-specific ranges. 36% of respondents agreed with the proposal.
- 37% of overall respondents agreed that allometric principles should be used to calculate space allowances, although there was widespread support across industry and welfare groups for the concept.
- Opposing viewpoints were expressed in response to the proposed species-specific headroom requirements. Most farmers and transporters felt the proposals were impractical, whilst on the other hand, some animal welfare organisations stated that the proposed allowances were insufficient. 39% of respondents agreed with the proposals.
- 74% of respondents agreed that animals should be prevented from being transported in rough weather at sea, and 67% agreed that they should not be transported in Beaufort Wind Force 6 or above.
- 5% of respondents thought there should be exceptions to the proposals presented in the consultation.

## Responses by question

### Live animal exports

#### **Q1: Do you agree that livestock and horse export journeys for slaughter and fattening are unnecessary?**

87%<sup>3</sup> of respondents agreed that livestock and horse export journeys for slaughter and fattening are unnecessary. 11%<sup>4</sup> disagreed and 2% did not express a definitive opinion.

The majority of respondents who agreed that such journeys are unnecessary were members of the general public and animal welfare groups. The main reason respondents gave for agreeing was that they were concerned about welfare standards during the transportation of live animals. Many individual respondents and animal welfare organisations stated that live exports were cruel and degrading to the animals involved.

Many respondents said that animals should be slaughtered in local abattoirs instead of travelling long distances.

A large number of respondents also made the case for slaughtering animals before they are exported as, in their opinion, this would be more cost effective, humane, and potentially more carcasses could be transported than live animals in an environmentally friendly way.

Several respondents indicated that, following the UK's departure from the EU, there was a clear opportunity to change legislation and make substantial improvements to animal welfare in transport.

The respondents who disagreed that livestock and horse export journeys for slaughter and fattening are unnecessary were mainly composed of farmers, membership bodies, animal transporters, meat processors and other industry representatives. Their main reason for disagreeing was also animal welfare standards, as they believe that the UK already has the highest standards of transport in the world.

The next most popular reason for disagreeing was the lack of local abattoirs. Several respondents stated that pressure from large retailers has led to the closure of many small local abattoirs across the UK leaving a small number of large abattoirs which results in excessive journey times. Their view was that often abattoirs in France and Belgium will be quicker to reach and closer than UK abattoirs.

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<sup>3</sup> Sector breakdown of the 87% who agreed: 79% were RSPCA campaign respondents, 15% were other members of the public, 5% were farmers and less than 1% included NGOs, transporters, vets and industry.

<sup>4</sup> Sector breakdown of the 11% who disagreed: 78% were farmers, 17% were members of the public, 2% were industry members, 2% were transporters and less than 1% were vets.



Although this consultation was issued by UK and Welsh governments, responses were received from across the UK. Respondents based in the Scottish Islands advised that they have no local abattoirs and therefore have no choice but to transport their animals long distances. Concerns regarding the effects of proposals, on journeys to and from the Scottish Islands, were raised in response to a number of the proposals in the consultation.

Several farmers and transporters made the point that the south of England is very close to the continent and that with the improved transport infrastructure and high welfare standards on lorries, a short sea crossing should not be prohibitive.

Some respondents from the livestock industry indicated that a total ban on exports for slaughter and fattening would remove vital competition from the market, leading to lower prices and therefore affect their costs and profitability.

**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?**

Although 85%<sup>5</sup> of respondents did not agree that the prohibition on export journeys for fattening purposes should apply to journeys where the animal is slaughtered within 6 months of arrival, the majority were not disagreeing with a ban on export journeys for fattening per se, but with the 6-month time limit proposed. These comprised farmers, members of the general public and animal welfare groups. Of these, some argued for a shorter time period and some for a longer one.

The main reason members of the public and animal welfare groups disagreed was because of concerns about welfare standards. The RSPCA campaign respondents were among those who disagreed and stated that export of animals for further fattening should be prohibited, regardless of any time period to slaughter after arrival.

Many members of the public and animal welfare organisations who disagreed on welfare grounds said a 6-month limit was insufficient to ensure animals were not being needlessly exported for slaughter. Many suggested longer time limits – the longest suggestion being 3 years.

Farmers who disagreed were opposed to the 6-month time scale or the ban in general. Many of the farmers who disagreed with the proposal advised that it does not take up to 6 months to fatten livestock sufficiently. For example, this time limit is nearly the lifespan of some

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<sup>5</sup> Sector breakdown of the 85% who disagreed: 82% were RSPCA campaign respondents, 10% were farmers, 7% were other members of the public and less than 1% included NGOs, transporters, vets and industry.

livestock, such as lambs. They argued that the time limit should be removed completely or reduced significantly. Shorter time frames suggested ranged from 1 to 4 months.

Many respondents who disagreed commented that any time limit would be impossible to enforce as it would be impossible to know if the animals were slaughtered before 6 months of fattening had passed. They stated that once an animal has been exported out of the UK, we have no way of monitoring or enforcing animal welfare standards.

Many members of the public and animal welfare organisations wanted a complete ban on live exports. Many commented that such journeys are cruel and inhumane and that, if animals must be exported, it should be 'on the hook not the hoof'.

10%<sup>6</sup> agreed with the proposal and 5% did not express a definitive opinion. The majority who agreed were members of the public, but many farmers and other groups who had an economic interest in live exports also agreed, including transporters.

**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?**

Respondents who disagreed with this question<sup>7</sup> did so for differing reasons: 44% stated that exceptions should be for breeding animals only; 46% wanted no exceptions for poultry; 2% wanted to allow all exports, while 3% wanted a total ban on live exports. The large number of identical responses from the RSPCA campaign contributed to these figures.

6%<sup>8</sup> of respondents agreed with the proposal and 7% did not express a definitive opinion. Those who agreed generally consisted of farmers, transporters and industry representatives. Those who supported the exception for breeding purposes stated that such animals are likely to be of higher value and therefore treated better in-transit. Some respondents said that live export for breeding also helps other countries to improve the genetic quality of their stock.

A large number of respondents, including the sizeable RSPCA campaign, were supportive of an exception for breeding animals but were against the exception for poultry live exports. The campaign respondents did not however highlight specific welfare concerns with poultry exports from Great Britain. Animal Aid campaign respondents raised concerns relating to

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<sup>6</sup> Sector breakdown of the 10% who agreed: 64% were members of the public and 31% were farmers. NGOs, transporters, vets and industry represented the remaining 5%.

<sup>7</sup> Sector breakdown of the 87% who disagreed: 80% were RSPCA campaign respondents, 11% were other members of the public, 8% were farmers and less than 1% included NGOs, transporters, vets and industry.

<sup>8</sup> Sector breakdown of the 6% who agreed: 57% were farmers and 35% were members of the public. NGOs, transporters, vets and industry represented the remaining 8%.

young chick and laying hens' susceptibility to fluctuating environmental conditions. Other critics indicated that poultry are sentient and that they should be treated in the same way as other animals.

CIWF believed that breeding animals and poultry should be the only exceptions, but specifically stated that the poultry exemption should only apply to recently hatched chicks. They stated that the deadline for arrival should be reduced from the current 72 hours after hatching, to 48 hours. RSPCA's organisation response also acknowledged the necessity of exporting breeding chicks. Both organisations called for better regulation of this export trade and further research into welfare impacts to ensure enhanced conditions for the animals.

**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?**

39% of respondents stated that this question did not apply to them; this group consisted mainly of members of the general public and animal welfare groups who had no financial interest in live exports.

23% of respondents said that a live export ban would have no financial impact on them; this group was mainly composed of farmers who did not export their livestock or horses for slaughter or fattening.

22% of respondents said that they would be significantly impacted by the proposal; this group was mainly composed of farmers, transporters, membership bodies and industry representatives. Many commented again that the closure of small abattoirs around the country means that crossing a border is sometimes the quickest journey and the best option for the welfare of the animal. Some respondents stated that a live export ban would remove competition from the market leading to lower prices for the primary producer.

2% of respondents stated that the financial impact would be insignificant; this group was mainly composed of farmers who did not export their livestock or horses. Some had concerns about the indirect effect of those currently exporting being forced to sell to the domestic market as this might have the potential to depress the market.

22% of respondents gave some indication of the extent of the financial impact of a live export ban on their business. However, most of their comments were not quantifiable as no baseline figures were provided.

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

62% of respondents stated that this question was not applicable to them. This group was mainly composed of farmers who did not export livestock or horses.

19% of respondents said that there were no alternatives they could explore in the event of a ban on live exports. This group was mainly composed of farmers and transporters. Respondents commented that they would be more reliant upon domestic trade, which they

felt was already under pressure and limited in the amount of stock the market could deal with. Many said that their businesses would be under threat by a ban on live exports.

19% of respondents did not express a definitive opinion.

## **Maximum journey times**

**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.**

We received polarised responses to the proposed maximum journey times, with respondents either believing proposed journey times were too short or too long.

The responses from the RSPCA campaign stated that journey times should be kept to an absolute minimum, suggesting a maximum of 8 hours for all species except broiler chickens, for which 4 hours was suggested. Some animal welfare organisations proposed shorter maximum journey times for certain species, including pigs, calves, sheep and recently hatched chicks. Of the other respondents who disagreed with the proposal, 46% were farmers and 50% were members of the public. Many representatives from the farming industry raised concerns that existing journeys could not take place in the proposed times.

5% of respondents agreed with the proposals, the majority of these being farmers and members of the public. Some animal welfare organisations, food standards bodies and equine welfare groups also expressed support for the maximum journey time proposals.

27% of respondents stated that the proposals would have a significant financial impact on their business or organisation, 77% of whom were farmers. 18% of respondents reported insignificant or no financial impact and 55% said the impacts were unknown or could not be calculated.

47% of respondents felt that exceptions to maximum journey times should be considered; this group was largely comprised of farmers and other industry members. Respondents suggested appropriate reasons for exception should include the following: geographic constraints (e.g. Scottish Islands), traffic incidents, adverse weather, temporary abattoir closure or capacity issues. 53% of respondents did not think exceptions were needed, including a large proportion of the members of the public and many of the animal welfare organisations that responded.

Where exceptions were permitted, many industry respondents believed that current requirements protected animal welfare sufficiently. Animal welfare organisations suggested the following requirements should be put in place where exceptions were granted: planned and unplanned inspections, animal tracking information shared throughout the journey (such as electronic tags), that all exceptional journeys are pre-approved by the Animal and Plant Health Agency (APHA), CCTV on vehicles, information on exceptions should be publicly available, and pre-agreed contingency plans to safeguard welfare.

In response to the proposal that a minimum of 48 hours must elapse after a journey before another journey may begin, 77% did not agree; and 76% disagreed with the proposal for a 7-day minimum rest period between journeys for cattle. There were polarised views on these two questions. Most farming industry respondents disagreed with both proposals, citing a lack of evidence and impracticality. Many animal welfare organisations and members of the public disagreed with the premise of a rest period, as this may provide the ability to repeat journey cycles indefinitely, compromising animal welfare. Some stated that if animals cannot reach their destination in maximum journey times, they should not be transported at all. Others proposed longer rest times of 7 – 30 days.

**Broiler chickens:** Industry representatives estimated approximately half of broiler journeys would not be permitted under the proposed journey times of 4 hours, significantly reducing this contribution to the economy. Poultry businesses estimated that current average journeys for broilers are under 12 hours. They state that the process of catching, loading and unloading birds can take up to two hours and the remaining time permitted is insufficient for travel. Other concerns included that short transport times may lead to undue pressure and increased safety risks for staff responsible for the transport.

Animal welfare organisations were in favour of the proposed maximum journey time for broilers. They stated that research shows that mortality for broilers increases with the length of the journey with higher death rates above 4 hours than below. One group in favour specified that the proposed time was only acceptable if transport vehicles and crates used met specific high standards.

**Recently hatched chicks:** Animal welfare organisations were largely opposed to the proposals for maximum journey times for recently hatched chicks of 21 hours. Some proposed that the maximum journey time of 4 hours for broilers should be extended to all poultry. Others proposed a shorter time of 16 hours in line with research, which indicated a depletion in yolk reserve and intensified stress-related physiological responses after this time. Animal welfare groups provided evidence that journey length and time from hatching to arrival are key risk factors for the welfare of recently hatched chicks. Evidence suggests

there are detrimental effects on chick growth and development if feed and water isn't provided as the yolk reserve depletes.

Poultry businesses disagreed with the proposal, estimating that it would impact on 70-75% of journeys, causing severe economic impact due to the high value of the trade. Industry emphasised that the quality of journey is more important than the duration, citing that they observed survival rates of 99.5% on journeys over 24 hours. Industry representatives highlighted the importance of allowing the transport of breeding stock to facilitate the delivery of genetic improvements.

**Pigs:** Industry representatives largely disagreed with the proposed maximum journey times for pigs of 18 hours and newly weaned pigs of 8 hours. They believed that the journey times laid down in the current regulation<sup>9</sup> are sufficient and further research is required before changing the existing requirements.

Respondents from industry argued that newly weaned pigs, finished pigs, cull sows and boars, and breeding pigs should be considered separately given the different purpose and management approach. Journeys for different purposes vary in length, with cull sows and boars generally needing to travel greater distances by road due to slaughterhouse capacity.

Industry representatives argued that breeding pigs should be exempt from maximum journey time requirements, as long-distance transport of breeding stock is necessary to distribute breeding lines and maintain genetic diversity. UK breeding stock is traded globally due to the country's high health status. These journeys are often longer but industry representatives stated that strict control measures were in place so that the animals arrived at their destination in "peak condition". Industry argued that restricting this trade may lead to UK producers relocating, increased reliance on imported stock and a loss of UK genetics.

Pig industry representatives commented that newly weaned pigs are usually loaded, transported and whilst being unloaded are vaccinated. Whilst this extends the overall journey time, it decreases the number of times the weaner is handled.

Some industry groups agreed with the proposal for maximum journey times and stated that almost all journeys currently take place within the limits specified for adult and weaned pigs. Animal welfare groups proposed a maximum journey time of 8 hours for all pigs, stating that they are easily stressed by transport and handling. One organisation (CIWF) proposed that exemptions should only be permitted for breeding pigs up to a maximum of 18 hours.

**Cattle and calves:** Some animal welfare and veterinary groups were supportive of the maximum journey time proposals for cattle of 21 hours, although some animal welfare

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<sup>9</sup> Under the current regulations, pigs may be transported for a maximum of 24 hours. Unweaned piglets may be transported for 9 hours, after which they require a 1-hour rest period and can then be transported for a further 9 hours.

organisations proposed shorter times for adult cattle of 8 hours. Animal welfare groups disagreed with the proposal for maximum journey times of 9 hours for calves up to nine months of age. They believed that these journeys should ideally be avoided altogether or be very short.

Most of the major cattle industry representatives did not support the maximum journey time proposals for cattle and did not believe the existing requirements should change. They considered the proposal to be impractical with likely negative financial impacts on the industry. There were specific concerns about the effect these proposals would have on farmers in more remote areas of the UK, including the Scottish Islands and Jersey.

Cattle industry and livestock auction representatives highlighted that livestock markets, collection centres and multiple pickups and drop offs are an integral part of the movement of livestock and impact on journey times. Some of these respondents suggested that time spent at markets should be an exception from maximum journey time.

Animal welfare groups were supportive of the proposed 7-day rest period for cattle, citing scientific evidence as presented in the Farm Animal Welfare Committee's (FAWC) 2019 report on welfare during transport<sup>10</sup>. All major cattle industry representatives disagreed with the proposed 7-day rest period. There were concerns about unintended welfare issues arising and financial impacts. Many stated that subsequent journeys should be allowed immediately, and some raised concerns of how it would work in practice for animals sold at auction or market. Livestock market representatives were concerned that markets would not be able to function under these proposals.

**Sheep:** Animal welfare organisations in general disagreed with the proposed maximum journey time of 21 hours. Many organisations suggested a maximum journey time of 8 hours for sheep.

Most industry respondents did not agree with the proposed journey time for sheep. They reported that the movement of sheep often involves multiple pick-ups, collection centres and livestock markets and shows. The proposed journey times would likely render shows and markets unviable. Many suggested that time spent at markets and collection centres should not be included in journey time.

Scottish sheep industry representatives raised concerns over the severe impacts the proposals could have on journeys from remote Scottish Islands to mainland UK. They argued that these journeys are essential and highly regulated, and the economic impacts of prohibiting them would threaten many rural communities. The remoteness of sheep farming communities in other parts of the UK was also raised by other industry respondents.

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<sup>10</sup>FAWC: Opinion on the Welfare of Animals during Transport

None of the major sheep industry representatives agreed with the proposed rest period of 48-hours. Some respondents raised concerns over how it would work in practice for animals sold at auction or market, and some stated that it could result in a loss of carcass weight and negatively impact meat quality.

**Horses:** Most equine industry, welfare and veterinary respondents agreed with the proposed journey times for horses of 12 hours and acknowledged that there is an association between the occurrence of transport-related health problems and journey duration. One animal welfare organisation commented that equines should have a maximum journey time of 8 hours, and a second upper limit of 12 hours should only be considered for high value elite competition and breeding equines. Equine welfare organisations said that exceptions to journey times should be on the authority of a vet. They suggested that consideration should be given to equestrian communities on remote Scottish Islands who may be impacted by the proposals.

Most respondents said they would not be financially affected by the proposals as most journeys take place under 9 hours. However, the measures would impact on the horse racing and competition industry, where thoroughbreds often make international journeys for competition or breeding.

All the equine groups opposed the 48-hour rest period between journeys which they felt would have a severe impact on domestic amateur and professional competition and breeding. It was argued that the British racing and breeding industries should be exempt from the proposal. Some respondents suggested equines should instead be rested for a minimum of 9 hours before they can travel another 12 hours. However, they stated this should not apply to horses being transported directly to slaughter; these animals should not exceed their maximum journey time.

**Other species:** Reptile trade representatives did not agree that the 21-hour maximum journey time should apply to reptiles and exotic pets. They argued that due to their different metabolism to mammals and birds, they can be transported for longer periods.

They also suggested the proposals would have significant implications for movements of reptiles and exotic pets. Many routes would no longer be viable as animals often come from overseas and are subject to lengthy airport clearance procedures. They proposed that these species should be exempt from maximum journey times, and the proposed 48-hour rest period.

Ornamental fish trade representatives did not agree with the proposed maximum journey times for all other species of 21 hours. They believed ornamental fish should be exempt due to their different requirements to air breathing animals. If packed correctly, ornamental fish can survive for over 48 hours in transit. Average journeys are currently 21-24 hours. They argued that the 48-hour proposed rest period would not be practical due to the way in which fish are packed.



## **Thermal conditions and ventilation**

**Q13a: 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,**

**Q13b; 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?**

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

55% of respondents agreed that long and short journeys of poultry with an external temperature outside of 5-25°C should be prohibited unless thermoregulation is applied. 53% agreed with the proposed temperature range of 5-25°C. 16% of respondents said that the proposal would have a significant financial impact on their business or organisation. These respondents mostly identified themselves as farmers or individuals and transporters.

Responses to the proposal that livestock journeys with an external temperature outside 5-30°C should be prohibited unless thermoregulation is applied came from opposing viewpoints. 36% of respondents agreed with the proposal. 34% agreed that the temperature range should be 5-30°C. Of those who agreed, around a third were farmers and the remainder were members of the public.

Of those who disagreed, the most represented sectors were farmers and members of the public. The majority of livestock industry representatives, including auction and market representatives, food producers and slaughterhouses, also disagreed with the temperature range proposed. Most who disagreed took issue with the lower range, which it was argued was unnecessary and impractical and would result in significant economic loss during the winter months. 47% of all respondents, most of whom were farmers, stated that the proposal would result in a significant financial impact to their business or organisation. 86% of respondents said that none of their current transportation vehicles had facilities to regulate temperature and provide ventilation. 57% of respondents estimated that the cost of retrofitting their vehicles to enable these capabilities would be significant.

Many animal welfare organisations disagreed with the proposed temperature ranges and proposed narrower ranges or species-specific temperature ranges. 57% of respondents agreed that there were other species that should be considered as vulnerable and have a smaller external temperature range applied than 5-30°C.

**Poultry:** Veterinary groups stated that poultry have higher rates of 'dead on arrival' (DOA) in extreme temperatures than other species and they supported the proposal in principle, although raised concerns about how the proposal may work in practice.

Animal welfare organisations were supportive of implementing temperature ranges for permitted journeys and most agreed the lower temperature should be 5°C. Some proposed that the upper temperature should be reduced to 22°C, as evidence indicates that at temperatures above 23°C mortality increases 6.6-fold. One organisation proposed a range of 10-25°C for spent hens. Another strongly recommended that all poultry should be transported in thermoregulated vehicles.

Poultry industry representatives strongly opposed the proposals, stating that there are already robust standards of practice in place to deal with adverse weather. They commented that the thermal conditions on the vehicle are more important than the ambient temperature, and that they are not aware of vehicles with a thermo-regulation system that work in the broiler or laying hen sector. Poultry businesses estimated up to 55% of journeys would be impacted in winter and in the summer up to 30%. The British Poultry Council advised that the impact of the proposed changes would have a severe financial impact on the GB poultry industry.

Animal welfare groups, including the Animal Aid campaign, voiced particular concerns for recently hatched chicks. Industry representatives stated that they are currently transported in temperature-controlled vehicles, so would be unaffected by the proposals.

**Livestock and horses:** Respondents from the livestock industry, including pig, cattle and sheep farmers disagreed with the proposal for external temperature ranges. Many industry members believed that the internal, not external, temperature should be considered. Industry members stated that these temperature requirements would have a significant impact on existing journeys as the temperature may remain below 5°C for extended periods in parts of the country. Regional differences in temperature may result in geographical trade restrictions and competitive disadvantages for some regions including the Scottish Islands.

Other industry respondents claimed the inability to move livestock during winter and summer months would result in significant financial loss. It would reduce throughput capacity at abattoirs leading to staff redundancies and higher costs for producers.

Sheep industry representatives stated that sheep generally live outdoors throughout the year in all temperatures and moving them in low temperatures would not negatively impact animal welfare. Pig farmers said the same for outdoor pigs and that they acclimatise to their environment well. Most equine industry, veterinary and welfare respondents believed that, from an equine point of view, the temperature range proposed was too restrictive. They claimed that horses can thermoregulate effectively and this can be assisted with rugs in lower temperatures and stocking density.

Many sheep industry representatives agreed that moving animals in too high a temperature can be dangerous for livestock due to heat stress. Equine welfare organisations agreed that there should be an upper limit of 30°C, but no lower limit. Animal welfare organisations stated that the upper temperature limit should be lowered from 30°C to 25°C. They also stated that calves should only be transported when the external temperature is 15-25°C due to the microclimate within animal transport vehicles.

One industry respondent stated that traffic congestion, which brings vehicles to a standstill, prevents adequate ventilation especially in hot weather. Reducing the amount of time vehicles are stationary in extreme temperatures would help maintain airflow and avoid heat stress, for example by prioritising live animal transporters in traffic.

**Other species:** Reptile and exotic species trade representatives stated that these species should be exempt from external temperature requirements. The proposals are not appropriate for reptiles and amphibians, as they are transported in specially designed boxes designed to maintain the internal temperature within a specific range.

Animal welfare organisations reported that some species of fish are highly susceptible to temperature fluctuations and should have a carefully regulated temperature range according to species, and whether they are cold, cool or warm water species. Ornamental fish trade representatives stated that due to the way fish are packed, there is no need for extra ventilation, temperature controls and/or warning systems.

Some animal welfare organisations advised that the following species may require a smaller external temperature range applied, outside which journeys should not take place: goats, reptiles, primates, amphibians, zoo animals, game birds, companion animals and unweaned animals (all species).

## **Space allowances**

**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.**

Overall 37% of respondents agreed that allometric principles should be used to calculate space allowances. A large proportion of industry affiliated respondents and animal welfare organisations, who disagreed, did express support for the proposals in principle but raised concerns about how they would work in practice. Industry stated they would be unable to assess the impacts on business until the formulae for the calculations are determined.

37% of all respondents agreed that the principles should be applied to all journeys, and 11% said the principles should apply to long journeys only.

Respondents who did not agree with the proposal included some food producers, livestock market or auction affiliates, equine groups and many farmers and transporters. Some industry groups who opposed the proposals believed further research is required before changes are made. Equine groups in opposition questioned how the principles would work in practice and believed space allowance should reflect existing best practice guidance. Reptile trade representatives did not agree with the proposals as they would not be appropriate for these species due to their different biology. They considered that reptiles are such a diverse class that it would be very difficult to implement in practice.

Several industry groups and animal welfare organisations requested further engagement on these proposals. They believed that the status of the animals should be considered in determining the calculations, including species, age, weight, sex, and health. Other factors, such as the natural desire for sheep to lie down in transit, as well as pigs' continuous access to water must be considered. Some animal welfare organisations agreed outright with the proposals and indicated that they would like the proposals to include even the shortest journeys, under 50km.

## **Headroom allowances**

**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.**

Opposing views were expressed in responses to the proposed species-specific headroom requirements. Most farmers and transporters felt the proposals were impractical. On the other hand, some animal welfare organisations stated that the proposed allowances were insufficient, and, in some cases, they proposed new allowances for different species.

Groups in agreement with the proposed headroom allowances included vets, some livestock market and auction affiliates and nearly half of members of the public who responded. 50% of respondents agreed that headroom requirements should apply to both long and short

journeys, 6% thought long journeys only, less than 1% thought short journeys only and 43% replied that they should not be applied at all.

37% of respondents stated that the proposals would have a significant financial impact on their business or organisation, while 56% stated the financial impact would be insignificant or none at all.

**Pigs:** Industry representatives did not agree with proposed headroom requirements for pigs. Respondents argued that as pigs commonly lie down during transport, headroom is not an issue. Cost implications of the proposals would be felt throughout the supply chain and costs of haulage would increase as a result. Industry advised that the proposals may reduce capacity of breeding pigs transported by air by between 30% to 50%. This may make shipments by air economically unviable. Overall, industry respondents agreed that adequate headroom should be provided for pigs during transport but would like to see a greater evidence base before existing requirements are changed.

Animal welfare organisations expressed concern that the headroom proposal for pigs was less than sheep although slaughter weight pigs weigh significantly more. Some organisations proposed larger headroom allowances for pigs, ranging from 15cm to 40cm.

**Cattle:** Cattle industry representatives did not agree with the proposed headroom requirements, arguing that changes were impractical. Industry and veterinary representatives requested clarity as to why there are differences in headroom requirements for beef and dairy breeds, as well as further information on the evidence which supports these proposals. An industry respondent raised concerns about welfare issues arising from increased headroom, including injuries relating to mounting behaviour in cattle. Industry representatives believed there would be a huge environmental and financial impact for the upgrade or replacement of vehicles, particularly the impact of changing vehicles from double-decked to single decked.

**Sheep:** All major sheep industry representatives disagreed with the proposal. They argued that one 'standard headroom' for sheep was impractical given the varying size, shape, and stature of over 80 sheep breeds. Veterinary representatives suggested that headroom requirements may be better defined from a fixed, rather than moving point of the sheep, such as the shoulder. Industry respondents highlighted that sheep would be more prone to injury if there is space to jump. Animal welfare organisations proposed that sheep should have a headroom allowance of 30cm to allow adequate ventilation.

Industry respondents were concerned that proposals would mean that decked lorries would no longer be viable. The effect of this could be nearly 50% fewer sheep transported in each load: adding costs, carbon footprint and reducing profitability.

**Horses:** The majority of equine groups that responded disagreed with the headroom proposals for horses. Most believed that the current requirements specifying minimum space allowance as 75cm above the withers should be retained. They claimed that measuring above the head is impractical, and a static point (withers) should be used as the base.

A veterinary group agreed with the headroom proposal and laid out specifications for space allowance either side of the animals and front and back to prevent respiratory issues developing. Donkey welfare groups highlighted that donkeys may have differing headroom needs than horses due to their longer ears.

All respondents agreed that headroom requirements for horses should apply to all journeys regardless of duration.

Most stakeholders stated that the vast majority of vehicles that are used to transport horses likely exceed the 20cm above the head proposal so there would be relatively small financial implications.

## **Sea transport**

**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.**

74% of respondents agreed that animals should be prevented from being transported in rough weather at sea, and 67% agreed that they should not be transported in Beaufort Wind Force 6 or above. Those in agreement included members of the public, NGOs, vets and farmers. Some of the animal welfare organisations that responded stated that the maximum wind force permitted should be reduced to 5, in line with the EU Scientific Committee on Animal Health and Animal Welfare recommendations. Some animal welfare groups believed that the only sea journeys permitted should be those within the British Isles for breeding animals.

Those who disagreed with the proposals included some farmers, transporters, equine welfare groups and livestock industry representatives. Many of them believed that the decision to sail should remain with the ship's captain, who would consider a multitude of factors along with wind speed that may impact the conditions of a sea journey when deciding whether to sail. Some respondents, including equine welfare groups, were concerned about the implications for trade from the Scottish Islands to mainland UK. Pig industry representatives were concerned about additional lairage costs due to cancelled sailings. Some respondents were concerned about the potential welfare issues that may arise where journeys are cancelled at short notice, including ensuring suitable housing facilities where animals can be held until sea transport can take place. Poultry industry representatives were concerned that delays in sailing could lead to a financial burden and potential welfare issues, including euthanasia of recently hatched chicks unable to travel.

## Exceptions

**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.**

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

**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.**

95% of respondents did not believe there should be exceptions to the proposals. This included the sizable RSPCA campaign, which stated “animal welfare must not be jeopardised, there should be no other exceptions”. The majority of animal welfare organisations stated that no exceptions should be made.

5% of respondents thought there should be some exceptions to the proposals. Respondents made suggestions for specific exceptions, including exceptions to proposals for all domestic journeys, exceptions to maximum journey times while animals are at markets, exceptions to maximum journey times for breeding pigs, and exceptions for transport from remote locations.

Animal welfare groups stated that if exceptions are granted, robust evidence that welfare will not be compromised must be provided. Suggestions for other conditions that should be met when exceptions are granted included the following: rigorous and regular formal training for hauliers and any party handling livestock, higher specifications for vehicles, additional bedding, additional rest stops, mandatory CCTV on vehicles, veterinary presence during loading and unloading and fitness checks.

Many industry representatives did not believe any additional requirements should be put in place in exceptional cases. They stated that if exceptions are granted, they will be in part to minimise any negative impact on animal welfare and that in all cases the welfare of animals being received is checked by a trained person.

42% of respondents thought it should be possible to use an exception on an on-going basis. These respondents included most farmers and transporters, some pig and cattle industry representatives and Scottish farming representatives. Other groups, including road haulier and veterinary representatives and an animal welfare organisation thought that exceptions should be provided on an ongoing basis, but these should be time limited. 7% of respondents, including sheep industry representatives and some animal welfare groups stated that exceptions should only be granted on a case by case basis.

## Part 2: Policy statement

We are grateful to all those who took the time to respond to the consultation. The responses received and the scientific evidence and veterinary advice available have helped inform our desired direction of travel.

Animal welfare is a devolved policy area. This policy statement is a joint statement by the UK and Welsh governments.

The Scottish Government has recently consulted on the recommendations made by the Farm Animal Welfare Committee. Our aim is to have, as far as possible, a consistent legislative approach across Great Britain and all administrations are working closely together to achieve this.

We have noted the range of responses. The consultation has raised some important considerations around how welfare in transport policy is shaped and operates. We will work closely with industry, NGOs and other stakeholders on our proposed policies through a series of workshops starting in the autumn, to explore some of the issues and the evidence in more detail and develop workable solutions which will generate good welfare outcomes. Once agreed, a package of reforms will be implemented through secondary legislation or guidance, as appropriate.

The proposals do not apply to journeys under 65 km, such as local farm to farm movements.

### Live animal exports

Having considered the evidence available, including responses to this consultation, the government confirms it will proceed with a ban on the export of livestock (cattle, sheep, goats and pigs) and horses from England, Wales and Scotland for slaughter and fattening.

Exports for slaughter and fattening from England, Wales and Scotland will be prohibited whether the animals originate from or are travelling through England, Wales and Scotland.

For the purposes of this consultation, exports for fattening were defined as exports where the animal is to be slaughtered within 6 months of arrival. A large proportion of respondents were critical of the proposed definition and considered a time limit to be unenforceable. Having taken account of this feedback, we propose to remove the reference to a 6-month time limit so that the prohibition will apply to all exports of livestock and horses where an animal is exported to the place of destination in order to be fattened for subsequent slaughter.

As proposed in the consultation, the government has decided to retain the exemptions for poultry exports and for purposes other than slaughter or fattening, such as journeys for breeding, scientific research and competitions or shows, as specific concerns have not been raised about the welfare implications of such journeys.



74% of respondents to the consultation stated that breeding exports should be the only exception to prohibiting live journeys. Animal welfare groups acknowledged that animals exported for breeding purposes are generally transported in smaller numbers and better conditions than those destined for slaughter and fattening

78% of respondents stated that there should not be an exception for live poultry exports, this statistic was driven by the sizeable RSPCA campaign which did not highlight specific welfare concerns with poultry exports from Great Britain. There was support from some animal welfare organisations for an exemption for poultry if it only applied to recently hatched, or “day-old” chicks. Existing poultry exports typically consist of significant numbers of recently hatched chicks from the UK to continental Europe and non-EU countries, and EU TRACES data shows that poultry exports are either for breeding or other purposes. Moreover, there were no exports of poultry for slaughter or fattening from Great Britain to the EU in 2020.<sup>11</sup> Whilst concerns were raised for the exports of poultry for other purposes, there was not sufficient evidence to include them in the ban.

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. Journey durations should be minimised where possible to reduce the risk of welfare complications arising during journeys. From a welfare perspective, the government views export journeys for slaughter and fattening to be unnecessary or unnecessarily stressful because the animals could be slaughtered or fattened domestically and, any such journey for slaughter or fattening, would be shorter or less stressful than any equivalent journey to a third country.

Respondents raised concerns about the lack of local abattoirs. The impact of a live export ban on abattoir choice was considered as part of the Impact Assessment. The number of animals exported for slaughter represents only a very small proportion of the total number of animals processed in the UK every year; slaughter export figures for 2020 from Great Britain to the EU account for around 0.03% of sheep slaughtered in the UK. The assessment found that despite a fall in the number of domestic abattoirs, recent trends indicate that more animals are being slaughtered in the UK and the current abattoir capacity should be able to absorb the supply of animals currently exported. We want to ensure that we are maintaining as broad a geographical and specialist range of those abattoirs as possible.

Some of the respondents concerned about the lack of abattoir capacity claimed that abattoirs in France and Belgium would be quicker to reach than those in the UK. Evidence in the Impact Assessment suggests that this claim is overstated. According to TRACES data<sup>12</sup>, the shortest direct to slaughter export journey from the UK to continental Europe was

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<sup>11</sup> These include anything else that is not covered by the category included in the dataset.

<sup>12</sup> EU Traces data which is not in the public domain. This 2018 data does not include where in the UK the exports are from. We therefore have assumed that journeys from the UK to continental Europe originated from Great Britain; thus, GB to continental Europe export journeys.

an estimated journey time of 18 hours, with a median journey time of 21 hours for all direct to slaughter journeys in 2018. The Impact Assessment also highlights that most journeys that take place in the UK are below 8 hours, with very few exceeding this time. The typical journeys for slaughter or fattening are therefore unlikely to exceed the median times for slaughter export journeys.

Following full consideration of the scientific and expert evidence, and the responses to the consultation, the government is taking advantage of the UK's departure from the EU to deliver on the UK government manifesto commitment to end excessively long journeys for slaughter and fattening by banning the export of live animals for slaughter and fattening through the Animal Welfare (Kept Animals) Bill. The UK's departure from the EU has provided us with a much-awaited opportunity to address this long-standing ambition.

## Maximum journey times

Currently, the welfare in transport regulation does not provide absolute maximum journey limits. Existing journey time requirements, including mid-journey rests, may be repeated indefinitely, provided animals are unloaded, fed, watered and rested for a minimum of 24 hours. After which, the whole process may be restarted and repeated. As FAWC state, this may pose significant animal welfare concerns, as animals in theory may be transported indefinitely.<sup>13</sup> Having fully considered the consultation responses and evidence available, the government is committed to introducing maximum journey times for live animals. Recognising the range of different opinions and evidence on the specifics, we have reviewed and revised our original proposals. We will have further discussion, working closely with industry on the practicalities, including the challenges faced by remote rural communities such as the Scottish Islands, with a view to introducing maximum journey times as outlined below.

- A maximum journey time of 4 hours for broiler chickens, excluding the time taken for loading and unloading. By excluding loading and unloading time, we aim to remove the risk of potential welfare issues arising from rushed loading and unloading to meet journey time requirements. We believe this is a balanced approach, which takes onboard the industry's concerns about the impacts on existing journeys whilst addressing the scientific evidence on welfare risks and mortality rates for broilers on journeys longer than 4 hours.
- A maximum journey time of 24 hours for recently hatched chicks. Evidence provided in responses to the consultation indicated very high survival rates of chicks beyond the proposed maximum journey time of 21 hours. The government values the importance of the global trade of breeding stock to facilitate improved genetic diversity and, where

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<sup>13</sup> FAWC: Opinion on the Welfare of Animals during Transport

welfare during transport can be ensured, export journeys of recently hatched chicks longer than 24 hours may be permitted if additional criteria are met. Evidence provided in responses also indicated that journey length and time from hatching to arrival are key risk factors for the welfare of recently hatched chicks. Evidence suggests there are detrimental effects on chick growth and development if feed and water isn't provided as the yolk reserve depletes. The exact criteria for potentially extending export journeys would be determined through our further engagement with stakeholders. We propose as a minimum the requirement for a journey log and the provision of specialist gels for sustenance.

- A maximum journey time of 18 hours for pigs. We have considered the consultation responses and scientific evidence available and propose to allow an exception for breeding pigs if additional criteria are met. The exact criteria would be determined through our further engagement with stakeholders. Consultation responses indicate that strict control measures are already in place to ensure that these high-value pigs arrive in very good condition and their welfare is protected. The government is proud of the UK's high health status and appreciates the importance of distributing our valuable breeding lines globally to improve pig production.
- A maximum journey time of 12 hours for newly weaned pigs, in line with scientific evidence and, taking on board comments from industry, to allow pigs to receive necessary vaccinations during unloading in order to minimise handling.
- A maximum journey time of 9 hours for calves up to the age of 9 months. Some animal welfare organisations and members of the public did not believe such journeys should be permitted at all. However, the government understands that domestic journeys of calves are often necessary and having considered the scientific evidence, we propose to introduce a 9-hour maximum journey time to ensure calf welfare is protected. We acknowledge that some industry respondents have concerns about the financial impacts of these measures; however, we believe this is a balanced approach. Responding to concerns about the effect these proposals would have on farmers in more remote areas of the UK, we propose a potential exemption for journeys if additional criteria are met. The exact criteria will be determined through the further work we will be doing with stakeholders.
- A maximum journey time of 12 hours for horses. Most responses to the consultation were largely in agreement with this maximum journey time proposal. However, the government is aware of the implications such measures may have on the horse racing and competition industry. Thoroughbred horses travel regularly, often internationally, to compete. Consultation responses and available evidence indicates that it is in the interest of those transporting these high value horses to protect their welfare during long journeys. The government will consider exemptions to the maximum journey time for those competing or racing, or thoroughbreds for breeding, if additional criteria are met. The exact criteria will be determined through the further work we will be doing with stakeholders.

For cattle, sheep and all other animals, we proposed a maximum journey time of 21 hours. Many farmers were supportive of this proposal however they, along with those opposed, raised concerns about journeys from remote parts of the UK, and journeys that involve livestock markets, collection centres and multiple pickups and drop offs. The government understands that such facilities are an integral part of domestic livestock movements. It is a complex issue with many practicalities to consider, and we therefore intend to work with stakeholders to explore the issues of journey times and how these relate to markets and collection centres in more detail.

For other species, we proposed a maximum journey time of 21 hours. The exotic and aquatic animal sectors raised valid points about the diversity of these species groups. We intend to work with stakeholders to devise appropriate maximum journey times for other species, including exotic and aquatic animals.

The consultation sought views on the minimum rest period before another journey can commence. While animal welfare organisations were concerned that the proposed 48-hour period was too short, responses from industry raised serious concerns about how the required rest time may work in practice. We will therefore do further work with stakeholders to determine an appropriate rest period that ensures both animal welfare and market function. We do not intend to take forward the minimum 7-day rest period proposed for cattle.

## Thermal conditions and ventilation

The current transport regulation defines short journeys as being over 65 km and up to, and including, eight hours in duration. Long journeys are defined as any journey which exceeds eight hours in duration. We did not propose any changes to the current journey definitions, and therefore the following policy proposals on thermal conditions would not apply to journeys under 65 km, such as local farm to farm movements.

At present, the welfare in transport regulation does not prevent journeys in extreme external temperatures. The current regulation requires that the vehicle is able to maintain a temperature between 5°C and 30°C with a tolerance of +/- 5°C. The external temperature during a journey may be significantly outside of this range, but as long as the vehicle is approved as being able to maintain the required temperature on board the vehicle then it would be in compliance with the current Regulation. We are aware that in extreme temperatures, especially in hot weather, vehicles that do not have the ability to thermoregulate do struggle to remain within the temperature range.

We have carefully considered all the arguments put forward, both for and against temperature limits for journeys and have adapted our proposition accordingly. Bearing in mind the strong welfare benefits in doing so, we do plan to introduce an external temperature limit for poultry, livestock and horses outside of which transport cannot take place 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. Before concluding on the specifics, we would like to do some further work with the various industry sectors to consider the practical implementation of this policy, taking into account the different ways in which poultry,

livestock and horses are transported, so that collectively we can secure evidence-based, good welfare outcomes.

For poultry journeys, we propose to introduce the external temperature range of 5°C to 25°C. The available evidence, as well as consultation responses from veterinary representatives, make clear that extreme temperatures have a severe effect on poultry mortality, and therefore we believe this to be a proportionate and sensible approach.

We appreciate that thermoregulated vehicles are currently not widely in use in the sector. Longer term however, the government is clear that the industry should aim to operate within the agreed external temperature range or use thermo-regulated vehicles. During our further work with stakeholders we will agree what suitable mitigations may be taken in the short term, and on the longer-term approach.

For livestock and horses, we propose to prohibit short journeys of less than 8 hours where the external temperature is above 30°C. Long journeys of over 8 hours would be prohibited where the external temperature is outside of 0 to 25°C. In both cases, journeys could take place outside these ranges if 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. Animal welfare organisations and livestock industry representatives acknowledged the risks of heat stress when transporting animals in excessively high temperatures. It is for this reason we are minded to implement these upper external temperature limits to protect animal welfare.

Consultation responses from livestock industry and equine groups highlighted significant concerns with the proposed lower temperature limit. Respondents stated that such a limit would result in significant disruption and economic loss, especially during the winter months. Respondents commented that many livestock and horses are outdoors year-round and acclimatised to lower temperatures, and so transporting animals in temperatures below 5°C should not negatively impact welfare. We have carefully considered these arguments and as a result, we will not take forward the proposed lower temperature limit for short journeys and we will decrease the proposed lower temperature for long journeys to 0°C. On board water systems are already a requirement for vehicles transporting animals on long journeys of over 8 hours. We propose to set a lower external temperature limit for animal transport during long journeys to reduce the risk of water systems freezing and depriving animals of access to water, which APHA report is an observed issue on livestock vehicles in below freezing temperatures.

Many industry respondents did not believe that the external temperature should be a consideration, only the internal conditions of the vehicles. However, the government understands that thermoregulated vehicles are not universally used for transporting livestock and horses, which means external temperature is the most appropriate measure currently available through which to protect animals from suffering the effects of cold or heat stress during transport; we propose to explore this further in our discussions with the relevant sectors.

Respondents representing reptile and exotic trade and aquatic species raised valid points on the specialised transport conditions of these animals. We intend to engage with them

further to devise appropriate requirements for thermal conditions for other species, including exotic and aquatic species.

## Space allowances

Although the majority of respondents did not agree with the proposal to use allometric principles to calculate space allowances, there was widespread support across industry and welfare groups for the concept. There was, however, some concern about how the principles would work in practice; without further information on the allometric formula (i.e. the  $k$  value), industry respondents were unable to determine the impacts of the changes on their business. The government therefore proposes to undertake further work with a range of stakeholders, to gather a greater evidence base and understand better the practical implications of using allometric principles before bringing forward any further proposals.

## Headroom allowances

The government has considered the consultation responses and available evidence and we have simplified our proposal. Subject to further work with industry, we propose to introduce new headroom allowances of 10cm above head height for pigs and 20cm above head height for all other animals. The requirements would apply to long and short journeys and would be measured from the highest point on the head of the tallest standing animal, as recommended by FAWC.<sup>14</sup>

Consultation responses and the available evidence emphasise the importance of sufficient headroom above standing height to ensure adequate ventilation as well as comfort for the animals. Measuring head room above head height rather than the shoulder or withers, as proposed by some respondents, ensures adequate ventilation as well as comfort by allowing animals the ability to stretch. Many pig industry representatives stated that a lot of headroom was not required by pigs, as they commonly lie down during transport. We acknowledge this is a common behaviour during transport; however not all pigs will lie down for the entire duration of the journey and adequate headroom is also required to ensure adequate ventilation.

## Sea transport

We have considered the consultation responses and our view is that there is not enough evidence to make specific decisions on transporting animals in Beaufort Wind Force 6 or above. We therefore do not intend to take forward this proposal. While evidence provided

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<sup>14</sup> FAWC: Opinion on the Welfare of Animals during Transport

indicates that the impact of stressors experienced during long distance sea transport is similar to those experienced during road transport,<sup>15</sup> there is insufficient evidence on the conditions which may mitigate them. Ship captains currently consider many factors before taking the decision to sail. After careful consideration of the evidence available and additional evidence provided during the consultation we have concluded that requiring this decision to be based on wind force without further evidence would not be a proportionate approach to protecting animal welfare and could result in additional welfare issues where sailings do not take place.

The decision on whether to allow live animals to travel on a Roll-on Roll-off ferry in extreme weather will therefore be left to the discretion of the ship's captain. We will provide guidance to ferry operators on the welfare requirements which must be maintained during extreme weather conditions.

## Exceptions

The reasons live animals are transported are extremely varied, as are the conditions of transport. We understand that some of the proposals consulted on are necessary and appropriate for certain types of journeys but not others. We have outlined above where we recognise compelling reasons for exceptions and our intention to work with stakeholders on the additional criteria which may need to be met in such circumstances.

## Other issues

Respondents to the consultation raised a number of other issues they felt were important to improving welfare in transport, but which had not been included in the consultation. These were:

- The implications of time spent at markets, shows and collection centres
- The importance of regular and formalised training for transporters of live animals
- Improved enforcement of the regulations
- Guidance on an animal's fitness to travel

On each of these we intend to undertake further work and engagement with stakeholders to work up more detailed proposals.

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<sup>15</sup> A review of the evidence on welfare aspects of the transport of live animals (2018) M. A Mitchell, J. Martin and P.J. Kettlewell. Scotland's Rural University College and the University of Edinburgh