



SCOTLAND

WORKING FOR THE SCOTTISH SHEEP INDUSTRY

Scottish Government Consultation Farm Animal Welfare Committee – Opinion on the Welfare of Animals during Transport.

All NSA Scottish Region members are reminded of the closing date (Friday 26th February 2021) to the upcoming Scottish Government’s consultation on the **Farm Animal Welfare Committee – Opinion on the Welfare of Animals during Transport.**

NSA Scotland wholly encourages all members to participate in this consultation, given the severity of some of the measures included within this report. Please help us to ensure a true representation is provided of the Scottish and wider devolved nation livestock industry practices which will be severely implicated should these damaging recommendations be brought into force. Animal welfare and associated controls are very stringent in Scotland and the assurance schemes are the backbone of this. Your personal examples and emphasis of key issues to your farming business will pave the way in addressing the severe lack of evidence base which currently exists. With so many of the proposed changes seemingly based on limited evidence, NSA Scotland is requesting more research and evidence gathering before any radical decisions are made by Scottish Government.

You can access and respond to this consultation online here:

<https://consult.gov.scot/agriculture-and-rural-economy/farm-animal-welfare-committee-opinion-on-the-welfa/>

NSA Scotland’s full consultation response will be based upon the below comments:

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| <p>Question 1. Future Research into the welfare of animals in Transport</p> | <ul style="list-style-type: none"> • NSA Scotland agree that evidence and research finding should be shared to reduce industry knowledge gap. This research should be used to make policy in conjunction with practical and historical evidence. |
| <p>Question 2. Live Animal Exports</p> | <ul style="list-style-type: none"> • Export journeys seen for slaughter or further finishing are incredibly useful to the livestock industry and must not be underestimated. Not only do these practices help to maintain competition in the marketplace they also help to drive values and prices received by our members. These prices and values drive investment and install protective and practical measures which further cement the high health and animal welfare operations which occur on a daily basis as a result. • Live exports within GB (for example, from the Scottish Islands to mainland) are a crucially important journey which not only ensures animal welfare incidents are prevented but also upholds the significance of existing Scottish red meat supply chains. Efficient and viable production in all parts of Scotland’s landscape contribute vastly to the economy and the transport journeys taken here differ immensely from the more populated areas of mainland GB. |

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| | <ul style="list-style-type: none"> • Further research into the feasibility of the economics, design and use of mobile slaughter facilities and local abattoirs to reduce the need to transport animals over long distances is a potential solution. The infrastructure and facilities would need to be in situ before any ban on live exports were to be imposed. |
| Question 3. Fitness for Transport | <ul style="list-style-type: none"> • We agree with the Scottish Government's proposed course of action in relation to supporting transporters and farmers with the correct information and training to ensure fitness for transport. • It is important that organisations such as NSA Scotland can facilitate the establishment of these best practice guidelines in conjunction with Scottish Government, other industry stakeholders and vets. • NSA Scotland are wholly in favour of increased dialogue efforts and best practice guidance to facilitate the improvement of identifying fitness to travel and endorse that appropriate training should be made more readily available with additional support to cover costs of training uptake. |
| Question 4. Transport of Horses | <ul style="list-style-type: none"> • NSA Scotland do not wish to comment on matters regarding the transport of horses. |
| Question 5. Means of Transport | <ul style="list-style-type: none"> • NSA Scotland advocate for an extensive discussion on the certification of all vehicles ahead of any further recommendations pertaining to this area. • Under the current QMS Cattle and Sheep Assurance Standards, all livestock must be transported by livestock hauliers who are approved members of the QMS Haulage Assurance Scheme or an equivalent scheme recognised by QMS such as Red Tractor Assurance Livestock Transport Scheme. • Additionally, QMS members who transport their own livestock must comply with the provisions of the Welfare of Animals During Transport Council Regulation (EC) No.1/2005 including relevant documentation. Vehicles and containers must be fit for purpose, regularly maintained, kept in good, clean condition and comply with relevant Health and Safety regulations, to avoid injury and suffering and ensure the safety of livestock. • The recommendation of sensory devices onboard transit vehicles would be welcomed to increase animal welfare, however sufficient validation of proposed monitoring devices (based on vehicle accelerometers) for animal welfare would be required in addition to the provision of appropriate research into positive or negative impacts on animal welfare is appropriately assessed. |
| Question 6. Handling at Markets | <ul style="list-style-type: none"> • NSA Scotland advocate that an auction market setting is highly regulated whereby appointed Animal Welfare Officers and extensive risk assessments along with many other operating protocols are used to ensure animal welfare is held to its upmost level of compliance. • We also advocate that should any further developments be made in this area of regulation that sufficiently detailed evidence bases are used with particular regard to practical measures and traditional methods. • Auction markets in Scotland are integral to the Scottish livestock industry and as such form a critical link in the whole of life supply chain quality assurance schemes. This results in an auditable set of standards in which |

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| | <p>all auction markets are expected to comply with to offer reassurance to consumers around vital areas of animal welfare. Key provisions within these standards include meaning that animals must have sufficient space to lay down, and that there is sufficient access to water provision. Additional provisions for animals who reside overnight (a particularly important provision for animals travelling from Orkney and Shetland to fit into ferry sailings) also are detailed meaning that animals must be fully bedded with access to appropriate feed and water.</p> |
| <p>Question 7. Space Allowances for animals transported</p> | <ul style="list-style-type: none"> • There is still a lack of evidence on establishing species-specific and within species, breed variable physiological and psychological needs during transport. A standard headroom would simply not work for sheep. • The proposals would result in a lack of hauliers and trailers meeting head room requirements for sheep. If imposed for both long and short-term journeys, a new fleet of livestock trailers/vehicles would be needed, resulting in delay and prevention of livestock movements until such trailers/vehicles were established. Producers and transporters operating across Scotland would incur additional administrative and familiarisation costs as a result of any proposed changes. Transporters would bare the initial costs of instalment, which would be passed onto producers for transportation services thus, employing further financial impact on producers in an already precarious economic position. |
| <p>Question 8. Transport Practices</p> | <ul style="list-style-type: none"> • NSA Scotland agree in principle all animals of the same species should be afforded the same level of minimum protection regardless of whether they are being moved for commercial purposes or for other purposes. • However, we do wish to make it clear the many varying journeys which take place on a daily basis in such a versatile country as Scotland whether they be for economic gain or otherwise. • Should any proposals to introduce Certificates of Competence be brought into effect, the necessary support and facilitation of this training and its associated costs must be addressed fully in advance of any ruling. The boundaries of statutory regulation must be fully assessed to ensure additional barriers in the industry are not introduced as a direct result. |
| <p>Question 9. Thermal conditions and ventilation</p> | <ul style="list-style-type: none"> • The Scottish sheep sector prides itself in being predominantly outdoor, semi-extensive and pastoral in nature. The diversification within our stratified sheep system builds on the innate ability of different sheep breeds to thrive across the range of Scottish climates. As a result, the thermal neutral zone of sheep would sit outside the proposed 5-30°C range. There is currently no evidence of welfare problems being caused by loading and transport <5°C and once loaded. If temperature is important, then it is the temperature in the trailer that should determine any regulation. • We do agree that sheep transported in extremely high temperatures may result in heat stress. FAWC states that “mortality from heat stress during road transport rarely occurs in sheep”, where adequate ventilation is maintained. Our concern comes with traffic congestion and road works, bringing many lorries to a standstill and many other factors that will undoubtedly have animal welfare and financial implications as a result. |

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| <p>Question 10. Long Journeys</p> | <ul style="list-style-type: none"> • The biggest concern here is what constitutes a journey, particularly for those sold through an auction mart or a collection centre. Here, a journey begins from the onward movement from an auction market or collection centre. However, the proposal is for the journey to start when sheep leave the farm and includes time spent in a lairage as part of the 'journey' despite not being in transit. A 48 hour rest period would also be required once a proposed 21 hour limit in journey time was reached. Any overnight lairage would delay onward travel. • Safeguards already exist within the Scottish Red Meat Supply chain to ensure animal welfare is the first consideration when transporting animals. The Scottish Quality Assurance schemes operated by QMS for example already cover red meat supply chains in Scotland. This covers whole of life, and whole of supply chain activities, ensuring there is an auditable set of standards in place to ensure that the highest standards of animal welfare are maintained. • It is concerning to read that the FAWC 2019 report states: "There is little scientific research on the interaction of journey duration and journey experiences and direct impacts of journey 'length' (distance / duration) on adverse welfare (or health) effects. As such, it is not possible to make evidence-based recommendations on the maximum journey length / duration for all animals that are transported." • The extent of the barriers that these maximum journey times would present would mean that in some instances it would not be economically viable, or physically possible due to implications on animal health and welfare that would arise from having maximum journey times implemented. |
| <p>Question 11. Journey Times and Rest Periods</p> | <ul style="list-style-type: none"> • A full and thorough assessment needs to be done to understand transport times and ranges. Collecting information through this consultation is not representative or accurate, and collecting average journey times is meaningless without understanding the maximum and minimum ranges. More evidence and understanding are needed. This requires significant time and resources, and NSA Scotland would be willing to work with Scottish Government and others to help gather this information. • If implemented the impact would be felt by businesses of our members. These new proposed rules would cause serious problems for farmers in the more remote and distant parts of the UK, including many of our island communities, and it would reduce marketing options for members at a time when they are relying on to be more productive/profitable. |
| <p>Question 12. Licensing requirements for transporters</p> | <ul style="list-style-type: none"> • We would recommend on a basis of animal welfare and driver safety and economics that the current system outlined in the QMS Haulage Assurance Standards is sufficient. In addition, it should be noted that, in order to haul livestock, drivers must go through regular training, and hold up to date copies of species-specific Certificates of Competence in the Transport of Animals by Road. Haulage drivers are specially trained to handle and transport livestock and must hold species specific certificate(s) of competence. • Should any new training or certification be brought in, NSA Scotland advocate that support should be made available to increase the |

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| | <p>opportunities of training and to cover the costs of training and any associated barriers to ensure optimal uptake.</p> |
| <p>Question 13. Transportation of animals by sea</p> | <ul style="list-style-type: none"> • It is estimated that more than 300,000 sheep and 40,000 cattle move from Scotland's islands to the mainland. • There are many sheep farmers who rely on sea transport for viability of their business. For example, those farming in Scottish or other GB islands often have no choice but to transport sheep via the sea. The majority of islands have no facilities to slaughter or fully finish their stock on the islands themselves, therefore transportation via sea is the only option. If a full ban on movements during Beaufort wind force 6+ were enforced, the outcome would be sheep being stranded on island or on mainland port 'waiting' to be allowed to travel. Thus, creating further welfare issues such as lack of grazing, lack of facilities for unloading, prolonged confinement, or if stranded on the small islands could lead to inadequate grazing options and malnutrition. There needs to be consideration for circumstances where transport under high winds and therefore rougher seas is essential to maintain animal health and welfare, as the uncertainty of the sea could potentially lead to further delay. There must be a contingency plan in place for reasonably foreseeable circumstances. |
| <p>Question 14. Transportation of animals by rail or air</p> | <ul style="list-style-type: none"> • NSA Scotland is not aware of any breaches in animal welfare regulation in particular regard to transportation of animals by rail or air. We are also not aware of the scale of demand for this type of transportation and suggest that it makes up a negligible percentage of animal transportations currently taking place. |
| <p>Question 15. Identifying welfare risks during transportation</p> | <ul style="list-style-type: none"> • NSA Scotland agree that feedback with a constructive dialogue between transporters and APHA relating to issues arising on all long journeys is important. However, it is important that these specific processes should be fully equipped with the resources required to maintain best practice and compliance with additional research and consultation. |
| <p>Question 16. Alignment of enforcement of welfare in transport</p> | <ul style="list-style-type: none"> • The introduction of penalties to reduce non-compliance of a regulation should be thoroughly investigated with many different approaches explored before being instigated. • We agree, that together with the provision of guidance to support compliance and promotion of best practice, effective enforcement is key to identifying and addressing concerns and plays an important role in incentivising compliance. NSA Scotland advocate that Local authorities and other UK enforcement authorities (especially APHA) each have important roles and responsibilities, and it is vital that they work closely and collaboratively with each other to ensure coherent and transparent outcomes. |
| <p>Question 17. Welfare at destination</p> | <ul style="list-style-type: none"> • "FAWC recommends that no animals shall be transported to a destination where the welfare conditions are lesser or contrary to UK legislation or codes of practice." • It is the view of the Scottish Government that in order for export journeys not to be associated with worse animal welfare, we should also take into account the welfare protections applying to animals after they have arrived at their destination. |

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| | <ul style="list-style-type: none">• NSA Scotland agrees with the two statements above but wish to consider and explore how this will be applied in practice and how it will be monitored in terms of timescale and reporting. |
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