

## Consultation on improvements to animal welfare in transport

Wildlife and Countryside Link response: February 2021

*Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 58 organisations to use their strong joint voice for the protection of nature and animals.*

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### Introduction

1. We welcome this consultation from the Department of the Environment, Food and Rural Affairs and the Welsh Government, and the proposals it advances to enhance the welfare of transported animals. The measures proposed within it, especially the ban on live exports for slaughter or fattening, will improve animal welfare and help put the UK at the forefront of global animal welfare standards.
2. We have provided responses to the questions where the expertise of our members can add relevant evidence and suggest useful policy enhancement. Our responses to consultation questions include:
  - Evidence demonstrating that live exports for slaughter or fattening are not necessary and that a ban will not cause adverse financial impacts. We also set out how the ban would deliver significant benefits not only for animal welfare, but also help defend against the spread of zoonotic disease and contribute to the UK's net zero target.
  - Proposals to improve the consultation measures for poultry (by including poultry in the ban on live exports for slaughter or fattening) and for pigs (by increasing the proposed headroom requirement for pigs in transport).
  - Proposed measures to improve the welfare of transported dogs, cats and rabbits, species not mentioned in the consultation document.
  - Evidence showing the need for the proposed transport improvements to be applied comprehensively, covering both short and long journeys and with minimal exceptions permitted.

### **Question 1: Do you agree that livestock and horse export journeys for slaughter and fattening are unnecessary? Please explain your views.**

3. Changing commercial realities have led to a sustained decline in the live animal export trade. In the mid-1990s 2.5 million animals were exported for slaughter or fattening from the UK.<sup>1</sup> By the mid-2010's that number had fallen to 0.5 million.<sup>2</sup> As a result, live exports now play only a marginal role in the farming industry - of the 15 million sheep raised in 2017 only 0.26% (40,000)<sup>3</sup> were subject to live export.

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<sup>1</sup> <https://www.ciwf.org.uk/our-campaigns/ban-live-exports/global-live-animal-transport-trade/>

<sup>2</sup> <https://commonslibrary.parliament.uk/research-briefings/cbp-8031/>

<sup>3</sup> <https://hansard.parliament.uk/commons/2018-02-26/debates/39AF207E-7235-4D57-8723-54F6F87CC17B/LeavingTheEULiveFarmAnimalExports>

4. The continuing rise in the use of refrigeration lorries<sup>4</sup> is a major contributor to this trend. Refrigerated transport allows dead animals to be hygienically transported at a lower cost than live animals. A 2017 study from the University of Wageningen suggests that the cross-border transport carcasses in refrigerated lorries can cost 40% less than transporting live animals over the same route in lorries.<sup>5</sup> The lower costs of transportation, arising from the greater use of refrigeration lorries, has helped drive a wider increase in British meat exports over recent decades.<sup>6</sup>
5. Given that a cheaper alternative to live animal exports exists, and that its increasing and now near-comprehensive usage is benefiting British farming, there is no economic necessity for the transport of live animals for slaughter or fattening abroad. In contrast there is a necessity to ban such transports on the following grounds:

*Animal welfare* – The Farm Animal Welfare Committee (FAWC) opinion on the welfare of animals in transport, upon which this consultation is based, concludes that ‘all forms of transport are considered stressful and may impact the welfare of the animals’.<sup>7</sup> A 2008 Compassion in World Farming (CIWF) report sets out how ‘the stress factors involved in transport include the mixing of unfamiliar animals, deprivation of food and water, lack of rest, extremes of temperature and humidity, handling by humans, exposure to a novel environment, overcrowding, insufficient headroom and noise and vibration’.<sup>8</sup> These stresses increase with the length of the journey. Mortality provides an impact metric, with the 2008 CIWF report noting a 13-fold increase in mortality amongst dairy cattle for long journeys of more than 300km when compared with short journeys of less than 50km. The inclusion of sea travel (which the FAWC opinion notes as causing particular distress) as part of many UK live export routes, and ongoing welfare compliance issues in European Union destinations<sup>9</sup> provide further exacerbating factors necessitating a ban on welfare grounds for UK live exports for slaughter and fattening.

*Health* – In 2004, an opinion issued by the European Food Standards Agency (EFSA), stated that ‘It is well documented that transportation of mammals, birds and fish can spread both animal and zoonotic diseases...the economic and welfare consequences of their spread by transportation can be disastrous’.<sup>10</sup> The opinion goes on to state that ‘a variety of stressors involved in transport are key factors that strongly contribute to poor welfare in transported animals and they also increase the susceptibility to infection of transported animals and the shedding of infectious agents in already infected animals. ... Transport should therefore be avoided wherever possible and journeys should be as short as possible’. As Covid-19 has demonstrated, warnings about human activities spreading zoonotic disease should be closely

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<sup>4</sup> <https://www.hexaresearch.com/research-report/refrigerated-trucks-market>

<sup>5</sup> <https://library.wur.nl/WebQuery/wurpubs/fulltext/420339> (calculation derived from table 3)

<sup>6</sup> <https://www.statista.com/statistics/316261/meat-export-value-in-the-united-kingdom-uk/>

<sup>7</sup> [https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/improvements-to-animal-welfare-in-transport/supporting\\_documents/fawcopiniononthewelfareofanimalsduringtransport.pdf](https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/improvements-to-animal-welfare-in-transport/supporting_documents/fawcopiniononthewelfareofanimalsduringtransport.pdf)

<sup>8</sup> <https://www.ciwf.org.uk/media/3818249/transport-in-europe-report.pdf>

<sup>9</sup> <https://www.ciwf.org.uk/media/7434627/report-on-implementation-of-eu-regulation-on-welfare-of-animals-during-transport-compassion-in-world-farming-october-2018.pdf>

<sup>10</sup> <https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2004.44>

heeded. A ban on live animal exports from the UK for slaughter or fattening is a necessary and proportionate response to this animal and public health challenge.

*Carbon emissions* - the University of Wageningen's 2017 comparison of live animal export and carcass transportation costs included a consideration of carbon emissions. The study found lorries can carry five times more quantity when carrying carcasses than when carrying live animals (a key reason for the reduced economic cost on meat as opposed to live animal transport). Even when balanced against the increased diesel usage by refrigerated lorries used for carcass transportation, this resulted in carbon emissions being 85% higher in the case of long-distance transport of animals compared to long-distance transport of meat. A ban on live animal exports from the UK for slaughter or fattening would make a helpful contribution to UK's efforts to reduce carbon emissions from the transport sector and to meet the net zero by 2050 target.

6. There is no economic necessity for live animal exports for slaughter or fattening. A ban on such exports is necessary on animal welfare, health and carbon emissions grounds. As such we agree that livestock and horse export journeys for slaughter and fattening are unnecessary.

**Question 2: Do you agree that in order to prohibit livestock and horse export journeys for fattening where the animal will be slaughtered soon after arrival, these export journeys where animals are slaughtered within 6 months of arrival should be prohibited? Please explain your views.**

7. We believe that livestock journeys for further fattening should be banned, irrespective of any timescales associated with any further rearing. However, if such journeys were to be allowed, they should apply to those animals which will be slaughtered within 8-10 months of arrival and not 6 months, as stated in the proposal. A traceability system should be put in place to ensure that the animals are reared for the required period before slaughter.
8. The possibility of export of live animals on to non-EU countries for slaughter, within months of leaving the UK, is also a cause for concern. A 2013 CIWF report noted the annual trade of over 3.4 million live animals from the EU to non-EU nations, resulting in 'massive suffering' through delays at the EU border, and the passage of animals into nations where animal welfare legislation is very limited.<sup>11</sup> The proposed prohibition would reduce the number of UK born animals exported to the EU and left vulnerable to this onward trade.
9. This loss of control over the health and welfare of the animals once they leave the UK is especially apparent now we have left the EU. The health and welfare of exported animals is reliant on the enforcement of Regulation 1/2005 in the country of their final destination (if that is in the EU) over which the UK no longer has any control over as a non-Member State. Any future changes to Reg 1/2005, which is in the Commission's work programme, would also be done without the UK's input.

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<sup>11</sup> [https://www.ciwf.org.uk/media/4037267/Export\\_of\\_live\\_animals\\_from\\_eu\\_to\\_noneu\\_countries.pdf](https://www.ciwf.org.uk/media/4037267/Export_of_live_animals_from_eu_to_noneu_countries.pdf)

**Question 3: Do you agree that the only exceptions to prohibiting live export journeys should be for poultry live exports, and animals going for breeding or production that will not be slaughtered within 6 months of arrival? Please explain your views.**

10. The proposed exemption for the export of live animals for breeding or production is based on the evidence of the FAWC opinion. The opinion suggests that commercial and conservation incentives to keep animals healthy, so they can fulfil their exported purpose, will help ensure their welfare. This incentive must be supported by strict transportation standards, tailored to meet the particular welfare needs of the species that are primarily exported for breeding and production, namely dairy cattle, and goats.<sup>12</sup>
11. The wholesale exemption of poultry from the export for slaughter or fattening ban is concerning. Whilst the FAWC opinion provides some evidence that day-old chicks can be transported (primarily for breeding purposes) without significantly adverse welfare impacts due to remaining energy and water reserves from the yolk sac, it is important to highlight that this does not represent the entirety of the UK poultry live export trade. In 2014 (the last year with publicly available figures) 53,000 live poultry animals with a weight over 185 grams, denoting an age greater than two weeks, were exported from the UK.<sup>13</sup> Such mature animals, without the benefit of yolk sac reserves, if transported for slaughter or fattening are likely to be affected by the same transport stresses as other adult animals – including deprivation of food and water, lack of rest, extremes of temperature and humidity, handling by humans, exposure to a novel environment, overcrowding, insufficient headroom and noise and vibration. A 2007 RSPCA study found that chickens raised in low welfare conditions were three times more likely to die in-transit to slaughter than chickens raised in RSPCA approved conditions – a mortality metric that suggests that transport stresses for adult chickens exacerbate existing welfare issues.<sup>14</sup> The 2017 University of Wageningen study looked in particular at the live transport of live chickens for slaughter and found ‘during the transport, birds with broken bones suffer from pain, are not able to stand up and reach water supply, are stepped upon by other birds, and are prone to die’.
12. Given this evidence of welfare impacts for adult poultry, the export of adult poultry for slaughter or fattening should be included within the wider ban. This would not significantly affect the UK chick export trade, the one live export trade still thriving, where exports are primarily for breeding purposes.<sup>15</sup> More widely on exemptions, the precautionary principle should be applied – with live transport for slaughter and fattening banned in all circumstances, except when there is clear evidence that welfare impacts are limited. We are not aware of any evidence that would justify any such exemptions, for poultry or any other species.

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<sup>12</sup> <https://commonslibrary.parliament.uk/research-briefings/cbp-8031/> (see table 1)

<sup>13</sup> <https://www.theyworkforyou.com/wrans/?id=2014-10-20.211113.h&s=poultry+live+exports#g211113.r0>

<sup>14</sup> [file:///C:/Users/Dell/Downloads/Everyone's%20a%20winner%20chicken%20report%20\(PDF%20590KB\).pdf](file:///C:/Users/Dell/Downloads/Everyone's%20a%20winner%20chicken%20report%20(PDF%20590KB).pdf)

<sup>15</sup> <https://www.britishpoultry.org.uk/export-win-for-british-poultry/>

**Question 4: What would be the financial impact to your business or organisation of no longer being able to export livestock or horses for slaughter or fattening? Please explain any impacts provided.**

13. Although Link is an environmental and animal welfare coalition rather than an exporting business, we feel it is important at this juncture to highlight again the University of Wageningen study, which demonstrates that the transport of meat is cheaper alternative to the transport of live animals. In a case study looking at the cross-border transport of lambs for slaughter (from Hungary to Italy, an equivalent distance of the UK to France), the study found transport costs to be 40% cheaper if the animals were transported across the same route as meat, after slaughter in their place of origin. As a live export for slaughter or fattening represents a more expensive transport option for UK farmers, it is difficult to see how a ban would lead to significant adverse financial impact.
14. The core argument against a ban has revolved around a hypothetical future financial impact. In response to the 2018 call for evidence on live exports, farming groups argued that the cost of transporting meat was likely to sharply increase after Brexit and that in such a scenario farmers would need to be able to access live animal exports, which could well become the cheaper post Brexit option. This 2018 response, from the Farmers Union of Wales, is indicative of such representations 'Given tariffs of around 50% of product value could apply on meat once we leave the EU, this [a live export ban] would collapse the trade in sheepmeat exports, which currently represents around a third of Welsh lamb sales'.<sup>16</sup> Happily, the Brexit Trade Deal agreed in December 2020 secured zero-tariff trade<sup>17</sup>, meaning that meat tariffs and the hypothetical scenario of live exports becoming the least expensive transport option, will not come to pass.
15. Post Brexit, live animal exports for slaughter or fattening continue to be a more expensive method of transportation for farmers when compared with transporting meat, a reality that has led to the commercial decline of the trade over recent decades. A ban on this financially unattractive and increasingly marginal transport option is unlikely to cause significant adverse financial impact for exporters.
16. This is further demonstrated by the widely applied RSPCA welfare standards for dairy cows<sup>18</sup>, which prohibits the export of dairy bull calves. The RSPCA has no evidence that any dairy farmer certified under the RSPCA Assured Scheme has suffered financially because of their inability to export calves. Similarly, there have been no reports of financial hardship from sheep farmers certified under the equivalent RSPCA scheme as a result of being unable to export animals.

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<sup>16</sup> [https://www.farminguk.com/news/live-export-ban-remarkably-shortsighted-given-brexit-uncertainty-union-warns\\_49043.html](https://www.farminguk.com/news/live-export-ban-remarkably-shortsighted-given-brexit-uncertainty-union-warns_49043.html)

<sup>17</sup> <https://www.gov.uk/government/speeches/prime-ministers-statement-on-eu-negotiations-24-december-2020>

<sup>18</sup> <https://science.rspca.org.uk/documents/1494935/9042554/RSPCA+welfare+standards+for+dairy+cattle+%28P+DF+7.76MB%29.pdf/41638530-20de-c6cc-5e9c-7b73f9c8f4b7?t=1557731468543>

**Question 6: 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.**

17. We do not agree with all the proposed maximum journey times as presented in Table 1 of the consultation document. In the majority of cases, the proposed times fall short of RSPCA suggested journey times, which are based on extensive welfare research.

Table comparing FAWC and RSPCA recommendations\* on maximum journey times:

	FAWC/Defra Recommendation	RSPCA recommendation
Cattle	21 hours (up to 48 hours)	8 hours
Sheep	21 hours	8 hours
Day old chicks	21 hours	24 hours
Calves	9 hours	8 hours
Pigs Newly weaned pigs	18 hours 8 hours	8 hours (first animal loaded to last unloaded)
Broiler chickens	4 hours	4 hours (from when birds leave the farm to arriving at abattoir; 8 hours longest in-crate time for any bird until death).
End of lay hens	21 hours	8 hours (from the time last hen is loaded to the time at the final destination)
Turkeys	21 hours	4 hours (from when birds leave the farm to arriving at abattoir; 10 hours longest in-crate time for any bird until death).
Ducks	21 hours	4 hours (from when birds leave farm to arriving at the abattoir; 6 hours longest in-crate time for any bird until death).
Horses	12 hours	8 hours maximum journey time for equines; consideration could be given to a second upper limit of 12 hours for high value elite competition and breeding equines transported by professional hauliers provided driver, vehicle and journey management meet the

		specifications in EU Regulation 1/2005 for longer journeys over 8 hours.
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\*These recommendations are based on [RSPCA Farm Animal Welfare standards](#) used in the RSPCA Assured commercial farm assurance scheme.

18. Whilst we would prefer the wholesale adoption of the RSPCA journey times, we recognise that the times proposed by the consultation are an improvement on current standards. We understand that the consultation proposals have been designed to cover the transport of live animals from Ireland to continental Europe through the England & Wales land bridge.
19. A 4-hour maximum journey limit for rabbits should also be introduced, in line with the FAWC broiler chicken recommendation. As with chickens, there are limited opportunities to feed and water rabbits when they are on board a vehicle. As a result, if the time for loading and unloading does not count to the journey time, animals have to sit in crates for long time without being cared for. Ventilation is a problem too, as several layers of rabbits are loaded on the vehicles, with animals in the inner middle of vehicles suffering from increased mortality.
20. Sick and un-weaned animals should not be transported at all, as they are more vulnerable to the stresses of transport.
21. The Government could reduce the need for longer journey times by ensuring the provision of a comprehensive network of local abattoirs. This would make it easier for farmers to slaughter their animals near the farm rather than transporting them elsewhere.
22. Over the last decade one in three small abattoirs in the UK has closed. This comes on top of previous decades which saw many areas reduced to just one or two abattoirs. For producer-retailers in some parts of the country this is already causing logistical and financial problems. There are now less than 249 red meat abattoirs in the UK, down from 320 in 2003 and 1,890 in 1971.<sup>19</sup>
23. But even where an alternative abattoir is not too far away it is not always suitable for producer-retailers. Many of them are Halal slaughterhouses, some of which use non-stun slaughtering methods. Also, some larger abattoirs are either unable or unwilling to slaughter animals for small producer-retailers and return carcasses to them economically; while others do not have organic certification so are not suitable for organic animals. The All-Party Parliamentary Group for Animal Welfare's 2020 report on small abattoirs includes a series of measures that could widen general access to local slaughtering services.<sup>20</sup>

<sup>19</sup> <http://sustainablefoodtrust.org/wp-content/uploads/2013/04/Re-localising-farm-animal-slaughter.pdf>

<sup>20</sup> <https://apgaw.org/wp-content/uploads/2020/06/The-Future-for-Small-Abattoirs-in-the-UK.pdf>

24. We would like to use this consultation response as an opportunity to also raise concerns around the transport of cats and dogs and to propose recommendations for safeguarding their welfare. We propose species-specific maximum journey times which are as follows:
- A maximum travel time of 6 hours for all adult cats and dogs.
  - Young cats and dogs under 14 weeks old should not be transported for longer than 3 hours. If over 1 week and under 8 weeks of age young cats and dogs must be accompanied by their bitch or queen, unless the journey has been approved by a veterinarian with expertise on the impact of transport on cats and dogs.
  - A minimum 1-hour rest stop should be provided to allow feeding, provision of water and sufficient time to aid digestion and water absorption before the journey recommences.
  - Loading and unloading time should be considered as travel time.
  - After 6 hours of travel a rest period of at least one hour must be given for adult dogs and cats. This is sufficient time for them to be given food and water. After this rest period they may be transported for a further 6 hours. If animals have not reached their destination after these journey times, they must be unloaded, fed, watered, and rested for 24 hours at a suitable location where they have the opportunity to exercise, toilet and properly rest.

**Question 11: 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.**

25. Yes, we agree with the FAWC opinion. However, 48 hours should be seen as minimum, with the greater the rest period the lesser the risk of travel over long routes in short timeframes through conjoined long journeys either side of the 48 hours.

**Question 12: Do you agree that there should be a minimum 7-day rest period for cattle? Please explain your views.**

26. Yes, we agree with the FAWC opinion. However, 7 days should be seen as a minimum. A 30-day rest period would support fuller recovery for cattle from the stresses of travel.

**13. Do you agree that we should prohibit both short and long poultry journeys when the external temperature is outside of a temperature range of 5-25oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the journey by means of a thermo-regulation system, and that this temperature range should be 5-25oC? Please explain your views.**

27. Yes, we agree with the FAWC opinion.

**Question 15: Do you agree that we should prohibit both short and long livestock and horse journeys when the external temperature is outside of a temperature range of 5-30oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the journey by means of a thermo-regulation system, and that this temperature range should be 5-30oC? Please explain your views.**

28. The temperature range for all live animal exports should be 5-25oC, in line with the recommendation for poultry.
29. The prohibition should be complemented by digital temperature and humidity documentation becoming compulsory for any live animal transport journey, no matter how long it is.
30. Humidity should also be considered during transport. If the prognosed enthalpy-value is above 60 kJ/kg, transports should not take place.

**Question 17: 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.**

31. The temperature range for all live animal exports should be 5-25oC.

**Question 20: Are there any other steps that can be taken to ensure animal welfare can be maintained in extreme weather? Please provide evidence.**

32. There should not be any animal transports in extreme weather as this may lead to animal suffering.

**Question 21: Do you agree that we should use allometric principles as a basis for future space allowance calculations? Please explain your views.**

33. Yes, we agree with the FAWC opinion.

**Question 23: Do you agree with the proposed species-specific headroom requirements? Please explain your views.**

34. The species-specific headroom requirements for cattle and sheep seem broadly appropriate, all falling above the 15cm of free space above head height proposed as an absolute minimum by CIWF (when suitable ventilation systems are in place).<sup>21</sup> We agree with the FAWC opinion for these two species.
35. It is however concerning to see the proposed 9cm headroom requirement for pigs falling well short of this minimum. It is unclear why such a low requirement has been proposed for pigs. Headroom allows for air to circulate, with increased ventilation allowing animals to cool down. Pigs suffer particularly from high temperatures, because they are unable to sweat effectively to lose heat. Mortality rates amongst pigs during transport are higher in hotter weather, with temperatures above about 15-17°C having a serious detrimental effect.<sup>22</sup> The very low

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<sup>21</sup> <https://www.ciwf.org.uk/media/7432109/ciwf-oct-2017-live-transport-common-problems-and-practical-solutions.pdf>

<sup>22</sup> <https://pubmed.ncbi.nlm.nih.gov/8085307/>

headroom proposed for pigs will jeopardise their welfare when transported in hot weather and should be reviewed.

**Question 24: Do you think that the proposed species-specific headroom requirements should apply to both short and long journeys? Please explain your views.**

36. Yes, the proposed headroom requirements should apply to both long and short journeys. The act of transport itself compromises animal welfare, creating a range of stresses that include being tightly confined in a strange habitat with previously unknown animals, being subject to significant motion, and having reduced access to food and water. These stresses are present in short journeys and are exacerbated rather than created by long ones. An indicator of the effect even short journeys have can be found in a 2010 study on transported pigs, which noted that during a 4.5-hour journey 26% of pigs vomited or retched, and 50% of pigs showed advanced symptoms of foaming at the mouth and chomping.<sup>23</sup> High welfare standards in transportation, including headroom requirements (and the space allowance and ventilation requirements proposed elsewhere in the consultation) should apply across all journeys involving live animals, reflecting the fact that all journeys will cause animal stress.

**Question 26: 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.**

37. We disagree with this proposal and recommend that animals are not transported during Beaufort Wind Force 5 or above. Transporting animals by sea includes motion of the vessel both up and down and side to side, which can cause sea sickness in pigs and increased heart rates and reduced rumination in sheep. The uncertainty of the sea state also poses transport risks. For example, poor weather can increase the sea motion, and extreme weather may also prevent vessels from sailing, resulting in increased delay, sometimes with animals confined on waiting transport. Accidents also happen, with animals falling into the water when being loaded, and ships capsizing (such as the 2019 sinking of Queen Hind, which killed 14,000 sheep).<sup>24</sup>

**Question 28: Do you think that there should be any exceptions to the previously mentioned proposals alongside the specific exceptions already outlined, excluding the proposal to prohibit live exports for slaughter and fattening? Please provide evidence.**

38. A strong precautionary principle should apply to the high welfare standards proposed in this consultation, with exceptions only permitted on the basis of new scientific evidence. The stresses induced by live animal transport has been clearly documented by decades of research (the 2008 CIWF report sets out a species-by-species summary of impacts) and the current scientific consensus is that live animal transport creates suffering across farmed animals. The

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<sup>23</sup> <https://www.cambridge.org/core/journals/animal-science/article/abs/vehicle-motion-and-motion-sickness-in-pigs/D8B4BA0AC7085A7EAD6EEE513EB3A31A>

<sup>24</sup> <https://www.theguardian.com/environment/2020/nov/27/romania-accused-of-silence-over-ship-that-capsized-killing-14000-sheep>

welfare standards proposed by this consultation seek to mitigate this suffering and there should be a high animal welfare evidence bar for exception proposals. Any proposals for exempting certain groups of animals from the new welfare standards should be supported by new evidence demonstrating transport stresses affecting that group are an exception to the rule. Without such evidence of lesser suffering, no exception proposals should be accepted.

39. A high number of exceptions are likely to undermine the welfare standards. They create a commercial advantage for those who utilise them and hinder enforcement. As acknowledged in the EU's 2011 review of the protection of animals during transport, weak enforcement of European transport welfare standards has undermined the efficacy of those standards and had a negative impact on animal welfare.<sup>25</sup> It is important the UK learns these lessons and ensures that the new transport welfare standards are not undermined. The new standards must be tightly enforced if they are to be effective.
40. Arguments for exceptions on purely economic grounds are marginal and should not override animal welfare concerns. The EU's 2011 Review considered the costs of compliance with EU transport welfare standards and found that for most species increased costs from compliance amounted to less than 1% of the total cost of transporting animals. To put this rise in context, the price of petrol in the UK has fallen by 6% over the past two years.<sup>26</sup> The cost of compliance with the new UK transport welfare standards is likely to be small, on a scale that could well be completely offset by further reductions in petrol prices or by other efficiencies. These efficiencies could include shorter journey times to slaughter within the UK, as proposed in our response to question 6.

This response is supported by the following Link members:

RSPCA  
Four Paws UK  
Rare Breeds Survival Trust  
League Against Cruel Sports

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<sup>25</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1436800382930&uri=CELEX:52011DC0700>

<sup>26</sup> <https://tradingeconomics.com/united-kingdom/gasoline-prices#:~:text=Gasoline%20Prices%20in%20the%20United%20Kingdom%20averaged%201.62%20USD%2FLiter,Liter%20in%20December%20of%201995.>