

EFRA Committee Inquiry: Moving Animals Across Borders

Written evidence submitted by Wildlife and Countryside Link: March 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. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas.

This response is supported by the following Link members:

- A Rocha UK
- FOUR PAWS UK
- HSI UK
- League Against Cruel Sports
- Rare Breeds Survival Trust
- RSPCA

Introduction

We welcome this inquiry from the Environment, Food and Rural Affairs Select Committee on cross-border animal transportation, a subject that has a considerable bearing on both biosecurity and animal welfare.

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 the economic impact of failing to prevent the establishment of invasive species brought to the UK by cross-border animal transportation.
- Evidence setting out why increases in invasive species capacity and resources should be considered as a priority in any review of inspections at the border.
- Evidence outlining the animal welfare implications, particularly for equines and dogs, of the new system of animal checks, documents and inspections necessitated by new trading arrangements with the EU.
- Evidence considering how increased scrutiny from the new processes could have positive consequences for animal welfare, if robustly enforced.
- Evidence demonstrating concern around the availability of veterinary surgeons to meet the demands of the new system.

- Evidence demonstrating that the proposed ban on live exports for slaughter or fattening 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.

Responses to Committee Questions

Q1. Does the UK have sufficient resources and capacity to certify, record and inspect animal movements across its border?

Invasive non-native species (INNS) represent a major environmental and economic threat to the UK. Current estimates indicate they cost the UK economy £2 billion a year, increasing to £2.3 billion by 2040, unless greater resources and inspections are assigned to tackle introduction and spread of these species.¹ The exotic pet trade ranks among the primary causes for intentional introduction of invasive species, with substantial growth over recent years in the number of non-native animals introduced through this route.²

Any review into whether the UK has sufficient resources and capacity to inspect animal movements at the border must therefore also consider the resources available to identify and inspect invasive species, which include non-native animals.

These resources are currently limited. Invasive species constitute one of the five biosecurity regimes in the UK. Compared to the other biosecurity regimes, including animal health, the UK biosecurity regime is significantly underfunded, receiving just 0.4% (922k) of the UK total biosecurity spend. This underinvestment means that we are currently failing to keep new, economically damaging species out of the UK. At present, an estimated 12 new non-native species are currently arriving into the UK every year. Defra's own data has shown that in the last 20 years three times more invasive species have become established in the UK compared to species covered under the four other biosecurity regimes combined.³ No species of animal health risk were introduced during that 20-year timeframe.

Under Article 13 Section 3c of Invasive Non-native Species Regulations (2019) GB are required to 'ensure appropriate checks at the United Kingdom borders, other than for the [IAS of Special concern listed

¹ Wildlife and Countryside Link 'Prevention is Better than Cure' (2020) <https://www.wcl.org.uk/prevention-is-better-than-cure-2020.asp>

² Lockwood, J.L., Welbourne, D.J., Romagosa, C.M., Cassey, P., Mandrak, N.E., Strecker, A., Leung, B., Stringham, O.C., Udell, B., Episcopio-Sturgeon, D.J. and Tlustý, M.F., 2019. When pets become pests: the role of the exotic pet trade in producing invasive vertebrate animals. *Frontiers in Ecology and the Environment*, 17(6), pp.323-330

³ Government response to the Environmental Audit Committee's First report of Session 2019 <https://publications.parliament.uk/pa/cm5801/cmselect/cmenvaud/332/33203.htm>

under Article 15]'. Despite this requirement of GB, invasive species biosecurity is the only regime without a dedicated inspectorate. Currently, limited, if any, checks are carried out at the borders to check for invasive species. This gap in border biosecurity has been highlighted both in the House of Commons Environment Audit Committee Invasive Species Inquiry and the House of Lords EU Committee Brexit and Biosecurity Inquiry. The Minister for Biosecurity, Lord Gardiner, stated in reference to resources for invasive species biosecurity, 'we have not, candidly, had the resources that I would suggest animal health and plant health have had ... More resources need to be put into this major contribution to environmental degradation'.⁴

With new trade relationships being explored post-Brexit, the threat of further introductions of invasive species is likely to be exacerbated. An increase in invasive species capacity and resources should be considered as a priority in any review of inspections at the border.

The decision to stop live exports of farm animals for slaughter or further fattening in 2021 will reduce animal movements, with positive impact on the resources needed to inspect cross-border movements. Neither the infrastructure nor the resources are sufficient at present to enable rigorous inspection of cross border animal movements. Once border crossing inspections are fully in force in both directions, on 1 October 2021, the new system of animal checks, documents and inspections necessitated by the UK's new trading arrangement with the EU are more onerous than the previous system. With Northern Ireland remaining part of the EU's Single Market and Customs Union, and thus subject to EU rules, this will add further complexity to the new system. It is encouraging to see the UK Government providing extra resource to local authorities in England in areas with border crossing points via the Port Health Transition Fund⁵ grants. However, it remains to be seen how effective this will prove.

Of particular concern regarding enforcement is the availability of veterinary surgeons. It is not clear that the UK has sufficient veterinary surgeons to meet the demands of the new system. This is potentially exacerbated by the fact that the new UK-EU agreement (the UK-EU Trade and Cooperation Agreement, or TCA) does not include mutual recognition of veterinary qualifications, which may impact on the number of EU nationals working as vets in the UK.

There is particular need to increase the number of veterinarians available to assist with border checks for companion animals. Puppy smugglers are currently able to easily circumvent UK border controls. Without extra resources, this problem is likely to grow as increasing demand is placed on the system after October 2021.

Similar issues may be expected with equine transport, which is also struggling under the current system due to the use of confusing documents containing unnecessary content. FOUR PAWS UK has proposed that the identification of horses on digital smartphone apps should take precedence over paper

⁴ <https://publications.parliament.uk/pa/cm201919/cmselect/cmenvaud/88/88.pdf>

⁵ A full allocation table of grants in England is available at <https://www.gov.uk/government/publications/port-health-transition-fund> (accessed 27/1/21)

documentation to smooth the process, ensuring accuracy of data in the Central Equine Database (CED). Extra equine-focused resources will also be required, to provide an appropriate number of GB Border Control Posts, capable of inspecting and housing equines.

Q3. What impact will the new UK-EU agreement have on moving animals across the Irish border and between GB and EU/Northern Ireland?

Northern Ireland remains in the EU Single Market and Customs Union under the Withdrawal Agreement. Northern Ireland will therefore continue to follow regulations and standards drawn up by the EU, whilst Great Britain remains outside of these EU structures. This means that both commercial and non-commercial movements of animals between Great Britain and the EU/Northern Ireland are now more complex. For commercial movements, the impact of the introduction of new procedures is already apparent. There has been an increase in paperwork, which has, in turn, led to delays at ports. These new administrative procedures include transporter authorisations, registration on relevant import notification systems, animal health certificates and veterinary checks, customs declarations and checks, and entry and exit declarations.

Non-commercial movements of animals (e.g., people taking their dog on holiday) are also subject to new procedures and increased testing requirements when moving from Great Britain to the EU and Northern Ireland.

There is no evidence to date that animal movements across the Irish border, effectively an EU internal border, have changed. The vast majority of the trade in live animals between the UK and Ireland consists of animals being transported for slaughter or further fattening across the Irish border. However, there are also exports of cattle and sheep from Great Britain to Ireland, and exports of cattle from Great Britain and Northern Ireland, through Ireland, to the rest of the EU.

As highlighted in our response to question one, any considerations of the movement of animals across borders needs to consider the possible increase in the introduction and spread of invasive species.

Historically, Great Britain has been a major source for the introduction of invasive species into the island of Ireland, acting as the stepping stone for species being spread from continental Europe.⁶ There remains a number of economically damaging high-risk invasive species that are established in GB, but are currently absent from the island of Ireland.⁷ The new UK-EU agreement presents a significant threat

⁶ Stokes, K., O'Neill, K. and McDonald, R.A., 2004. Invasive species in Ireland. *Unpublished report to Environment & Heritage Service and National Parks & Wildlife Service. Quercus, Queens University Belfast, Belfast.*

⁷ Lucy et al. 2020 Horizon scan of invasive alien species for the island of Ireland, *Management of Biological Invasions*, 11: 155-177

for intensifying the two-way movement of invasive species between these two islands. This includes the potential for the island of Ireland to become a greater source for new invasions of new species into Great Britain. For example, the new shipping route from Waterford, Southeast Ireland to Rotterdam opened in July 2019, presents a new potential route for the transport of animal species from Europe to Ireland and from there into GB.

Furthermore, greater trade and movement between the Republic of Ireland and Northern Ireland could facilitate the spread of established invasive species between these two countries. Given the cost to the UK and Republic of Ireland of at least £2 billion a year, the most cost-effective approach to invasive species management is to stop invasive species arriving in the first instance. An increase in capacity and resources is vital to ensure adequate inspections are put in place to identify invasive animal species being intentionally and unintentionally moved between these two countries.

The Government should commit to the recommendation made by the Environmental Audit Committee in October 2019, to triple the invasive species biosecurity budget to £3 million.⁸ A further £3 million should also be provided to form a dedicated invasive species inspectorate.

This investment would also fund approximately 20 inspectors for a dedicated INNS inspectorate, ultimately preventing the establishment of 24 new invasive species, and eradicate 10 established invasive species, by 2040. This is a 50-67% reduction in new introductions, and a 5% reduction in established species, restricting the spread of a further 10%. Crucially, this investment would also save the UK economy a total of £2.7 billion over 20 years - a return on investment of £23 for every £1 spent.⁹

Q4. How should the Government balance animal health and welfare alongside economic interests?

Animal health and welfare should not be seen as separate from economic interests. Successive studies have shown that poor animal welfare standards lead to zoonotic diseases, which can severely impact individual sectors and lead to widespread human ill health, with consequent economic disruption.¹⁰ The impact of BSE on British cattle farming in the 1990s, and the effects on the wider economy and public health, provides a stark warning as to the economic consequences of putting efforts to cut farming costs above animal health and welfare needs (BSE started with the provision of poor quality food, injurious to cattle health).¹¹ As set out above, failure to act on threats from invasive species also carries a hefty price tag, with invasive species costing the UK economy £2 billion a year. Healthy flora and fauna, both farmed

https://www.researchgate.net/publication/341445299_Horizon_scan_of_invasive_alien_species_for_the_island_of_Ireland

⁸ <https://publications.parliament.uk/pa/cm201919/cmselect/cmenvaud/88/88.pdf>

⁹ Please see our 2020 report 'Prevention is Better Than Cure' for further detail:
https://www.wcl.org.uk/docs/Prevention_is_Better_than_Cure_Report_2020.pdf

¹⁰ <https://www.ciwf.org.uk/media/3756123/Zoonotic-diseases-human-health-and-farm-animal-welfare-16-page-report.pdf>

¹¹ <https://www.cdc.gov/prions/bse/about.html>

and wild, is the only way to secure healthy economies. As stated in Professor Dasgupta's recent report on the economics of biodiversity, our economy is 'part of nature, not separate from it'.¹²

Q5. What impacts will ending live animal exports for slaughter and fattening have on UK farmers, processors and other businesses?

Adverse economic impacts will be very limited. 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.¹³ By the mid-2010's that number had fallen to 0.5 million.¹⁴ 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) were subject to live export.¹⁵ The continuing rise in the use of refrigeration lorries 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 of carcasses in refrigerated lorries can cost 40% less than transporting live animals over the same route in lorries.¹⁶ Given that a cheaper alternative to live animal exports exists, and that its increasing and now near-comprehensive usage is benefiting British farming, the ban on live animal exports for slaughter or fattening will simply cement an economic transition that is already nearly complete.

The impacts of the live animal export ban will be felt primarily in terms of animal welfare benefits, which will in turn reduce the risk of economically disruptive animal and human disease. 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'.¹⁷ The ban on live animal exports for slaughter or fattening will ameliorate those consequences.

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957629/Dasgupta_Review_-_Headline_Messages.pdf

¹³ ¹ <https://www.ciwf.org.uk/our-campaigns/ban-live-exports/global-live-animal-transport-trade/>

¹⁴ <https://commonslibrary.parliament.uk/research-briefings/cbp-8031/>

¹⁵ <https://hansard.parliament.uk/commons/2018-02-26/debates/39AF207E-7235-4D57-8723-54F6F87CC17B/LeavingTheEULiveFarmAnimalExports>

¹⁶ <https://library.wur.nl/WebQuery/wurpubs/fulltext/420339> (calculation derived from table 3)

¹⁷ <https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2004.44>

Q6. Does the UK have sufficient capacity to slaughter and process animals that are currently exported? If not, what could be improved?

Capacity is currently limited - over the last decade one in three small abattoirs in the UK have closed. This follows 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 1971.¹⁸ 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 address this situation and widen general access to local slaughtering services, including new mobile slaughter facilities.¹⁹

Q7. How will Great Britain leaving the EU Pet Travel Scheme affect both legal and illegal movements of animals between GB and the EU/NI?

The new system for non-commercial animal movements is undoubtedly more complicated than the previous pet passport scheme, and places greater responsibility on pet owners wishing to travel with their animal. Government must ensure they make a concerted effort to publicise these changes, to allow owners to take the necessary steps and avoid a situation in which people travelling with their pets are turned back at the border. Border delays at the Eurotunnel of up to ten hours occurred during the weekend March 13/14 2021, for many non-commercial and commercial dogs being transported. Once holidays resume and the weather is warmer, such queues could result in major animal welfare consequences for both dogs and horses transported across the channel.

We welcome Government's move to tighten up on the illegal and legal pet trade by exploring issues such as raising the age for imports to six months, lowering the maximum number of puppies allowed to be imported per person and per vehicle, and reintroducing tick and tapeworm treatments. These also present opportunities for greater enforcement at the border. COVID-19 restrictions have seen a huge rise in legal imports of puppies and illegal trade, as seen by the confiscation of puppies at border control. This can only be managed with better at-border inspections.

¹⁸ <http://sustainablefoodtrust.org/wp-content/uploads/2013/04/Re-localising-farm-animal-slaughter.pdf>

¹⁹ <https://apgaw.org/wp-content/uploads/2020/06/The-Future-for-Small-Abattoirs-in-the-UK.pdf>

Wildlife collections, pets and zoos are recognised as one of the largest pathways for the introduction of species of Special Concern under the IAS Regulation into GB.²⁰ There are strict restrictions on keeping, selling, rehoming, breeding and releasing listed species into the wild due to their significant threat to native wildlife. However, despite being added to the list of Special Concern species, there are still numerous examples of listed animal species being reported in the wild in the UK.

For example, the racoon dog was reported in the wild in Nottingham in 2019 and in Wales in 2020 despite a ban on the species being in force since February 2019. This clearly demonstrates that current rules and checks are insufficient to enforce current restrictions regulating banned species. With new trade links being explored and further species being added to the list, we expect that leaving the EU will further exacerbate this issue.

Adequate funding and resources must be provided to enable more inspections post-border, and improved enforcement of these measures. Government should commit to tripling the invasive species budget to £3 million and invest a further £3 million for a dedicated INNS inspectorate, as highlighted above.

Q8. Are the current rules and checks on the movement of domestic animals strong enough to prevent illegal activity? If not, what could be improved?

No. Current rules and checks on domestic animals at the border have not proved strong enough to prevent illegal activity. Commercial legal imports of puppies and dogs increased by 54% from the EU into the UK in 2020, with imports from Romania, a country previously identified as a known risk country for the illegal trade in dogs, rising by 66% and now representing over half EU exports to the UK²¹. However, as stated, the new system and its increased series of checks and inspections, along with some policy changes, mean that Government is now able to make changes to enforcement.

Q9. What impact will the EU Animal Health Law have on the movement of equines between GB and the EU/NI from April 2021?

Since the end of the transition period, there have been significant changes to regulations, and the process to move horses is considerably more complex and time consuming. For instance, 60 pages of paperwork are now required in place of the previous four pages, taking veterinary surgeons hours to sign off rather than minutes. In addition, there are not appropriate facilities, recruitment and training of personnel to administer the movement of equines between Great Britain and the EU/Northern Ireland,

²⁰ Booy, O. (2019) Comprehensive analysis of pathways of unintentional introduction and spread of invasive alien species – report of the United Kingdom

²¹ APHA (2021) Commercial Imports of dogs into the UK in 2020

raising the possibility for new welfare concerns. This could result in extended journeys and delays due to non-compliance with paperwork and failed inspections, changes in routes to avoid transit through Great Britain which may result in long sea journeys, and changes in management practices.

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