



**National Sheep Association**

The Sheep Centre, Malvern  
Worcestershire, WR13 6PH

Tel: 01684 892661

Fax: 01684 892663

[enquiries@nationalsheep.org.uk](mailto:enquiries@nationalsheep.org.uk)

[www.nationalsheep.org.uk](http://www.nationalsheep.org.uk)

**Response to a call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU.**

22<sup>nd</sup> May 2018

The NSA has submitted a response to the on line questions in the call for evidence but we would also like to submit the following contribution. The National Sheep Association is the UK's only membership organisation for sheep farmers and those involved in the UK sheep industry. As a charitable organisation one of our key objectives is around improving the health and well being of sheep and the industry that surrounds them – therefore ensuring good sheep welfare is a key objective. We consider good sheep health and welfare to be an essential element of efficiency and profitability and also an important aspect of the image and reputation of our industry.

As a membership organisation we successfully strive to encourage our membership to engage with our work and this results in the NSA being a very grass roots association with a lot of practical experience and knowledge to contribute. We have the UK split into 9 different 'regions' each with a formal committee structure, and in addition a UK wide Policy and Technical Committee that reports to the NSA Board. Through this structure we regularly identify individuals with high levels of expertise in specific subjects and we encourage these people to support our work in these areas. This way of working has led to the production of this paper which we would like to submit to the Defra Call for Evidence. This paper has been largely produced by an NSA member, Hamish Waugh, who has long taken a leading role for us in the area of welfare in transport and the development of livestock transport regulations. Hamish has drawn on a number of other individuals to pull these views together and the NSA is happy to submit this paper as an addition to our on line submission.

**A. Philosophical perspectives.**

The opportunity to respond to the above call for evidence is welcomed. There are matters of both philosophy/ideals, and practicality, which we would like to draw attention to before going into the detail of the actual 'call for evidence'.

We take note of the area of the evidence requested, ie it has to do specifically with controlling live exports for slaughter and appears to be designed to improve animal welfare during transport after the UK leaves the EU.

We can understand this objective and we support moves to ensure good welfare outcomes but we would draw attention to the fact that a significant proportion of animals sold outside the United Kingdom are sought for further fattening/finishing. In the case of sheep particularly to France (by far our most important customers) we are aware that much of the trade requires a period in the destination country, in part to give a level of provenance and in part to finish the



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animals in a way that ensures the end product carries a particular flavour more suited to the French cuisine and palate. This aspect of the trade cannot be replaced by slaughtering here in the UK.

We draw attention to the fact that huge strides have been made over the last century, or more, in the way stock is transported. From stock being walked right across the country by drovers, through to some fairly inadequate early livestock transporters during a period of farm and transport mechanisation, to today when loading facilities, farm vehicles, trailers and lorries, are of a high specification. There have also been huge improvements in roads, the understanding of what 'good' looks like, and also in the means by which policing of standards take place. What has been lost over the same period of time is local and regional supply chains, supported by a network of abattoirs. The result is that some animals travel further for slaughter but under far better conditions. 'Transhumance' has always been, and continues to be practiced – where grazing animals are moved to their feed rather than their feed being moved to them. Transhumance of live animals makes good environmental sense and can be argued to have a lower carbon footprint than processing feed and moving feed to the animals.

The majority of livestock being traded from their farm of origin are moved on relatively small transport (four wheeled drive vehicle plus trailer) either to a collection point or to an auction market. Usually they will have been picked up from a yard at the farm and when they are taken to the market (a public place open to scrutiny) they are penned safely usually for a few hours before being loaded on to a long- distance transport facility which is subject to careful inspection and which has benefitted from modern design to ensure high standards of welfare.

Some 25 years ago increased concern was being expressed about the business of animal transport and it resulted in the first chair of animal welfare being established at Cambridge University. Professor Donald Broome was the first incumbent and he was instrumental in developing a great deal of positive thinking about the entire subject. He was supported enthusiastically by a considerable number of organisations including the specialist trade organisations covering breeding, production, marketing, processing, veterinary, transport etc, the animal welfare organisations, and the farming unions.

Professor Broome, (now Emeritus Professor) was responsible for stimulating a wide variety of focussed research centred on the welfare of animals and he gained a high level of credibility and respect from the majority of the organisations involved. He came to many well founded conclusions which were a result of understanding practicality and realism, even though there were attempts to skew the discussion with emotive issues. One of the practical aspects of the discussions which took place at the time had to do with the economics associated with the trade. Some of these are listed as; a). Farmed food animals can be divided into two distinct sectors, animals which take food provided by the farmer by walking/being transported to it by the act of grazing or feeding on specifically grown roots, usually but not uniquely sheep and cattle. Then there are food animals which are housed in sheds, generally poultry and pigs, have the food taken to them by the farmer. The former rely on the prevailing weather conditions, climate and other matters of practical consideration while the latter are able to operate with far less reliance on the weather etc but are associated with buildings, and manufactured food ingredients. b). Grazing animals (sheep and cattle) sometimes need to be moved from one farm to another simply because the farm of origin cannot sustain them. There can be many reasons for this including; drought; floods; seasonality; chosen system of farming. Climate change has already had a serious influence on these aspects. The results however are the same in that the farmer either needs to import food to his farm or else to sell his stock. Buying food costs money and when profitability is low there is no spare cash and so he must sell – and in this modern age any business needs cash flow. This aspect is one of the least understood of all the issues which have

to do with livestock farming and is one of the most important reasons why a farmer has to move his stock.

There is a general migration of stock from North to South which reflects the better growing and climatic conditions in the South. It is a fact that the warmth of the Sun is less in the North with negative consequences for the seasonal growing pattern.

The current system has evolved based on the need for essential grazing animal welfare (feed, water, environment) to be provided at all times, although there are many other aspects and many pressures which influence the welfare of animals. Firstly there have been vast improvements in the understanding of the means by which good welfare is delivered. While there are still some areas where improvements could be made, the general direction of this whole business has been positive. Farms are generally more professional, transport, marketing and processing has more methodical control; equipment is of a much higher standard. Stronger economic drivers also mean that few individuals and companies involved in rearing, transporting, or processing food animals would consider anything less than looking after stock to the highest levels required.

## **B. The Call for Evidence**

### **The Purpose.**

We appreciate the purpose which is set out in this section and understand the political and social pressures that are in place. What may not be understood by people who have less contact with the farming fraternity especially in remote areas of the UK is the fact that farming itself and extensive livestock farming particularly is under considerable financial pressure.

Encouragement has been given to farmers to seek consistent markets of high quality and for the last 40 years or so, as members of the EU, progress has been made in developing regular trading patterns with France and other EU countries. The last 15 years has seen an increase in the trade being for carcasses and cuts and this is to be welcomed as it provides jobs and economic activity here in the UK. However the live trade has still continued albeit at a much reduced level and it is seen to be essential at times of the year in order to keep prices at a level where the wider value of livestock is kept high. The loss of this trade would have massive and damaging repercussions. Whereas the Private Members' Bill entitled Live Animal Exports (Prohibition) introduced to Parliament by Theresa Villiers MP clearly has a degree of following, it should be recognised that in a world where we are seeking to enhance our ability to trade with other countries and not restrict it, the adoption of this Bill would limit the ability of sheep and cattle farmers to carry out their legitimate businesses. With few other options this would have a serious knock on effect on their ability to carry out their traditional function of looking after the environment and grooming the countryside. There would also be a knock-on effect on rural populations with all the attendant consequences.

### **Scope.**

From the evidence we've drawn attention to in items 1-8 in this response we consider there would be little benefit in carrying out the various actions set out under 'Scope'. We would however draw attention to the devolved nature of the legislation and the fact that the devolved areas of Scotland, Wales and Northern Ireland would have the most to lose by a loss of export opportunities or/and an increasingly stringent set of rules. In addition there are already serious difficulties in obtaining qualified livestock transporter drivers to bring stock from the devolved nations into England. We would recommend that great care is taken to avoid the introduction of

rules which put even greater pressure on this vital connection for trade especially as we move into a relatively unknown world in trading terms. We have some confidence that FAWC will be aware of likely negative outcomes and unintended consequences of introducing unnecessary new legislation.

### **Slaughter close to the point of production.**

This is an easy preference to identify with and we do so with alacrity. However, bearing in mind the facts as set out in paras 2-8, which identify the nature of the need to move stock away from the areas in which they were born, it is not always easy to define where quite large numbers of stock, when finished, will be processed. Our supply chains and related processing has become far more concentrated and of larger scale, with retailers often working with dedicated processors. This is one reason why we have lost so many small and medium throughput abattoirs and with stock dispersed around the UK it is inevitable that some will have to travel long distances. The high levels of legislative requirements and associated high costs to maintain and run a modern abattoir are a big factor behind the closure of many plants, and there needs to be a degree of certainty that there will be adequate and consistent supplies to ensure viability.

### **UK Government reforms to be grounded.**

We agree entirely with this and from our perspective would have serious difficulty in seeing how any serious changes to the present legislation could be justified especially against the background of one of the purposes of Brexit being to enhance the opportunity for trade and not to build artificial and unnecessary barriers.

### **After the call for evidence.**

We would be delighted for this response to be made available to the public and would welcome further involvement and input into any subsequent consultation.

### **Background to Call for Evidence.**

We recognise the reality that all forms of transport of animals may be stressful, including loading and unloading and all the other problems set out in paragraph 18- 19 of the Call for Evidence document. Nevertheless, we would contend that animals are only moved from their normal familiar environments for a serious purpose. Most of these are covered in paragraphs 1-8 of this document. The costs associated with animal movement are high and these issues have to be measured against the fact of there being a real need to move them. Usually it is because the balance of benefit lies in the fact that they need to be moved and most other options are less beneficial from a welfare, environmental, and economic standpoint.

### **Welfare in transport standards.**

While there may be some truth in the fact that there is such a thing as first and second class transport systems for stock, even what might be described as second class has to meet the legislative standards.

## **A Review by FAWC and SRUC and University of Edinburgh.**

We would be happy to be interviewed by these bodies.

### **Animal welfare concerns**

This is noted and it is to be hoped that the UK Government will take into consideration the fact the livestock are often produced by relatively small farms in remote parts of the UK where they are part of the rural community. In particular the hills and uplands are already suffering from economic pressures on their communities by the serious lack of understanding by urban dominated governments who have no idea of the difficulties with which they are faced. It is hard to see how yet more rules and regulation will benefit the welfare of their stock.

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### **The Practical Approach**

The vast majority of farmers would prefer that their stock is slaughtered as near to the point of production as possible. Unfortunately practicality does not allow this. However, a political drive to increase the efficiency of the entire food chain, from point of production to the supermarket checkout over the last 50 years or so, would indicate that politicians need to take responsibility for the fact that this has led to many small, local abattoirs being closed. These closures have meant that animals have needed to travel greater distances, often over 8 hours to reach an abattoir. The belief that animals going direct from farm to abattoir increases animal welfare has led to spending much longer on a vehicle, particularly where sheep are concerned. This time may exceed 18 hours, due to lorries visiting several farms before they are fully loaded. The welfare of sheep in particular is greatly improved if they are rested in an auction mart and given chance to empty the contents of their stomachs before travelling a relatively shorter duration of time to an abattoir.

There are very good reasons why animals should be allowed to travel to abattoirs within the EU as outlined in the response to Paragraph 9, below. Such journeys should be within the time scope of the present regulation, ie, should not exceed 28 hours travelling time plus a rest on the vehicle of at least one hour, with fans running should conditions dictate. The National Sheep Association believe that any welfare problems that have arisen relate to a lack of enforcement of the regulations and would be prepared to give consideration to a system where industry take on assurance of regulatory compliance. In this case journeys might only be permitted on assured routes that have been previously approved, and where the welfare of the animals concerned are known to be of an acceptably high standards. We would not be opposed that they should be subject to controls equivalent to the current regulation of a further journey limit of 14 hours following a mandatory rest of at least 1 hour at the European port of entry.

Under the current regulation animals are inspected by a veterinarian to ensure they are fit for transport. Over and above this we would suggest the vehicle on which they are travelling is also inspected prior to loading, A vehicle inspection would ensure that the conditions during transport are of good quality and alleviate the bad press animal exports received in September 2012, where a vehicle that was not fit for purpose was used to transport sheep across the English Channel. Please see our answer to Question 3, d)

*Paragraph 4. The UK Government wishes to improve the welfare of animals during transport by:*

It should be noted that the implementation of European Council Regulation (EC) No. 1/2005 brought about several improvements in the way animals are transported over long distances, these included the mandatory introduction of insulated rooves, fans to regulate temperature and airflow, drinking systems, improved ramp angles for animals to climb etc. Experience of driving these long distance lorries has demonstrated other improvements, such as a change from steel spring suspension to air suspension. Eleven years after the introduction of the regulation the makers of long distance animal transport vehicles are constantly updating the specifications of new vehicles which improve the welfare of the animals they are carrying. The review of the regulation in 2011 did not propose any changes to the regulation.

*Paragraph 4b, The UK Government will work with Devolved Administrations to try to ensure that any improvements are introduced consistently as far as possible and without disadvantaging agriculture in any part of the UK.*

I am delighted the UK Government would not seek to implement new legislation that would “disadvantage agriculture in any part of the UK.” On his recent visit to Scotland, Phil Hogan, European Commissioner for Agriculture and Rural Development, clearly hinted that meat exported from the UK post Brexit would be very likely to attract a tariff if the UK leaves the customs union.

Somewhere between 4.5 and 5 million sheep were exported from the UK to the EU in 2016 (AHDB figures show that 82,000 tonnes was exported in 2016, based on calculations of a carcase weight averaging between 16 and 20kgs.) This is a significant proportion of the UK's total sheep production.

Table 1 in Annex A of your document demonstrates how vital intra community trade is with the EU during times when there has been no significant improvement in the value of farmed livestock for a number of years as outlined in EU Commission, 10 November 2011. Report From The Commission To The European Parliament And The Council On The Impact Of Council Regulation (EC) No 1/2005 On The Protection Of Animals During Transport. which you refer to in paragraph 21.

In the absence of a customs union an outlet for these animals which does not devalue them further must be found in order to maintain the viability of farmers who keep sheep.

*Paragraph 8, Recently, an e-petition to Parliament to “end the export of live farm animals after Brexit” received nearly 100,000 signatures and was debated in Westminster Hall in February 2018. A recent EU-wide petition called “Stop the trucks” which received over one million signatures across Europe.*

The point should be made that signatories of these petitions have no practical experience in the movement of livestock, nor do they have understanding of the infrastructure which produces them. It would seem that they've felt the desire to sign such petitions due to the rhetoric contained within them, petitions which have been drawn up by organisations who are opposed to livestock farming in the first place and are frequently impassioned vegans who have highlighted the occasional circumstance when a journey of this nature has compromised the welfare the animals taking part. Most of which carry graphic photographs of sheep not associated with occurrences either in the UK or associated with a journey that originated within the UK. Many thousands of animals cross the English Channel in both directions in perfectly acceptable conditions and circumstances every year as detailed in tables 1 & 2 in Annex A of your document.

It is worthy to note here that evidence taken from the EU scientific document. “Report of the Scientific Committee on Animal Health and Animal Welfare”, where it says on page 85

"During a smooth voyage the heart frequencies of sheep can be lower than during the road transport (Hall et al., 1999). Adequate ventilation is the most important requirement for roll-on roll-off transport.

## 9.2. Conclusions

During roll-on roll-off ferry crossings, provided that ventilation is good and the sea is not too rough (wind up to force 4) sheep are less adversely affected than whilst driven along a road in a vehicle. Hence a sea crossing can be considered to be a rest period at such wind speeds. However, motion sickness, noise at a very aversive level, abortion and injury may occur at wind speeds of force 6 or above."

**Paragraph 9. The UK Government would prefer animals to be slaughtered close to the point of production, and considers that a trade in meat and meat products is more desirable than the long distance transport of animals specifically for slaughter. It is important to emphasise that any future proposed UK Government reforms should be grounded and justified in terms of delivering animal welfare objectives.**

The vast majority of farmers would endorse this stance. Sadly practicality does not allow this often for reasons associated with economics and unpredictable weather patterns. We support the objective that new legislation will be "grounded and justified in terms of delivering animal welfare objectives." If we accept the findings of the Report of the Scientific Committee on Animal Health and Animal Welfare, it should be noted that animals bred in the South East of England will be far closer in terms of time and distance to abattoirs the other side of the English Channel in both France and Belgium than they are to the abattoirs in Wales and the Midlands where they are travelling at the moment.

**Paragraph 19. All forms of transport (road, rail, sea and air) may have negative effects on the animal's welfare. There is evidence to show transport can compromise animal welfare in a number of ways through, for example, extreme temperature ranges, lack of food and water, insufficient ability to rest, noise and vibration. 2**

EFSA Journal 2011; 9(1):1966. Scientific Opinion Concerning the Welfare of Animals during Transport

Although familiar with this document, I would make the point that the comments are more likely to be attributable to shorter distance journeys on vehicles that are not of a specification permitted to transport animals over 8 hours. The point has already been made that the introduction of the Regulation has brought about solutions to ensure temperature control, the ability to give food and water, and an additional improvement has been the introduction of air suspension on vehicles, which has reduced noise and vibration and ensured a smoother ride, particularly when cornering.

**Paragraph 21. A report published in 2011 by the EU Commission found that overall the EU transport regulation had a positive effect on the animal's welfare but that serious welfare problems during transport may exist. 3** We would like the welfare in transport regulatory regime which applies after the UK has left the EU to reflect the latest knowledge of animal welfare 2 and as such give the level of protection we would wish to see.

The report referred to makes the point that any breakdown in welfare conditions for animals during transport occurs where the enforcement of the regulation is lax, as is quite rightly stated, where policing of the regulation is enforced with meaningful penalties for those who flout the regulation have combined to see a reduction in the number of animals arriving at their destination dead or not fit for transport. As suggested previously, routes to another country

should be approved and assured to ensure that the regulation is adhered to and that the welfare of the animals transported will be of the highest quality when they reach their destination.

**Q1: We would welcome factual information on animals you currently transport to help us develop a better understanding of current movements.**

a) What species of animal(s) do you transport?  
What volumes, how often and for what purpose i.e. slaughter, production or breeding?  
18,000 to 20,000 sheep and 450 to 500 cattle for further fattening, slaughter and breeding

b) When transporting animals **within** the UK, what are your average journey durations?  
Anything from local journeys of less than 1 hour to the local auction mart, to 18 hours transporting animals away from an auction mart, where two or even three drivers may be used to ensure journey time is kept to a minimum.

c) Do you buy or sell animals at market? If so, how long does it take to transport animals to or from the market? How long do animals on average spend in the market?  
My own animals will reach market within 40 minutes of leaving home and will spend two or three hours in the market before being sold. The time spent in the auction after the fall of the hammer will be dependant on how soon the purchaser can organise transportation. We are content that auction marts have the facilities to care for the animals needs where there is a delay in getting animals to their final destination.

d) When transporting animals **within** the UK, does the journey involve road, rail, air or sea? (Please select all that apply).  
Road and occasionally sea when moving animals off the Hebrides to the mainland to improved grazing usually in the autumn months.

e) Do you **export** animals **outside** the UK? If yes;  
No

i. What species do you **export** and in what volumes and how often?  
ii. Do you **export** animals for slaughter or production or breeding? (Please select all that apply).  
iii. Please indicate which country(s) you export to.

f) When transporting animals to other EU Member States, what are your average journey durations?

g) When transporting animals to other EU Member States, does the journey involve road, rail, air or sea? (Please select all that apply)

h) If transporting animals to **third countries**, what are your average journey durations?

i) If transporting animals to third countries, does the journey involve road, rail, air or sea? (Please select all that apply)

j) Do you **import** animals? If yes;  
No

i. What species do you **import** and in what volume and how often?  
ii. Do you **import** animals for slaughter or production or breeding? (Please select all that apply).  
iii. Please indicate which country you import from.

k) Are you based in Northern Ireland? If yes;  
No

i. Do you transport animals to and from The **Republic of Ireland**?

ii. What species of animals do you transport and in what volume and how often?

iii. Do you **transport** these animals for slaughter or production or breeding? (Please select all that apply).

iv. What is the average journey duration of these movements?

v. Do you transport animals to and from **GB**?

vi. What species of animals do you transport and in what volume and how often?



vii. Do you **transport** these animals for slaughter or production or breeding? (Please select all that apply).

viii. What is the average journey duration of these movements?

**Q2: We would welcome your views on how well current welfare in transport requirements and standards are currently working.**

a) What are the key current regulatory requirements that you think protect the welfare needs of animals during transport?

Driver, or attendant training and the requirement to hold a certificate of competence, the improvements to vehicle construction, the need to consider and maintain a journey plan and an overall improvement in washing out facilities where vehicles are cleaned faster and to a higher standard of cleanliness thereby reducing the risk of the spread of disease.

b) What issues or deficiencies in the current regulations are you aware of?

None

c) What do you consider are the most important considerations for improving animal welfare during the transport of animals or related operations? Please indicate if your priority areas are species specific.

ALL legislation and controls should be species specific as they react differently and have different backgrounds etc eg sheep were originally desert animals and behave quite differently to cattle which grazed open spaces and pigs which were woodland foragers.

d) The current EU regulation requires transporters to reach a higher standard if they are transporting animals on long journeys i.e. more than 8 hours. How do you think we should define long journeys?

Journey length has to be measured by expected journey time, this then takes into account that motorways are easier to reach in England where average speeds will be 56mph whereas in the Highlands of Scotland an A road might be no more than a single track road and an average speed of 20mph with a large vehicle might be considered as speeding.

e) What evidence do you have that journey length influences the welfare conditions for animals? Scientific research indicates journeys within the 28 hour allowed time frame (for sheep and cattle) do not compromise welfare, the most stressful part of the journey is at time of loading and unloading, where animals are entering an unfamiliar environment.

f) On long journeys, the regulation currently requires rest stops to allow the animals to recover before continuing their journey. There is no limit on the number of rest stops required nor a maximum journey limit.

i. Do you believe there should be a maximum number of rest stops? Please indicate which species you are referring to.

The regulation was created using the best scientific evidence available, therefore, we are content that animal welfare is of a high standard. Only where export distance goes beyond guaranteeing that level of welfare standard to be maintained, would we suggest restricting the number of rest stops.

ii. Do you believe that there should be a maximum journey limit? Please indicate which species you are referring to.

As referred to earlier, we are advocating journeys that can be reached within 14 hours of reaching a port within the EU along routes where welfare has been previously assured. This would fit in with the regulation as it currently stands. We would note that there will still be a need to fit in with the current regulation post Brexit. I.e. It is not in the scope of the UK government to extend journey times.

g) What evidence do you have on how the different forms of transport (road, rail, sea, air) affect animal welfare? Please indicate which species you are referring to.

Sheep

h) Do you have any evidence on the transport of unweaned animals? What age related conditions do you think should apply? Please indicate which species you are referring to.

Only in very exceptional circumstances would unweaned sheep be transported within the UK, on the very rare occasion that they are, ewes and lambs should be penned separately.

i) What conditions do you think should apply to animals post transport? Please indicate which species you are referring to.

Use of assured routes would confirm that animal welfare is a priority at point of final destination.

j) How do you think "fitness to travel" should be defined? Please provide an explanation for your answer. Please indicate which species you are referring to.

Where animals go for live export they are assessed by a veterinarian, we believe this is the best way to assure fitness to travel. We would expect that veterinarian to be experienced in sheep veterinary matters. It also gives the person undertaking the transport operation the confidence that a highly qualified person has assessed the health of the animals prior to departure. As stated before, it may provide an opportunity to check that the vehicle used to transport the animals is fit for carrying the animals, this is particularly pertinent when a vehicle from a third state is used in the operation.

**Q3: We would welcome your views on possible future reform ideas.**

a) Does the journey end point i.e. slaughterhouse or production facility influence animal welfare? Please provide an explanation for your answer.

We take the view that the key consideration should be the welfare of the animal at all times. Stock is transported within UK for further finishing (production) without any problem and the same applies when stock is delivered to a slaughterhouse.

b) Do you think that a ban on live animal exports, or imports, should apply? If so, for what purpose i.e. slaughter, production. Please give reasons for your response.

We do not believe a ban on live exports should be applied, provided that the welfare of the animals concerned is assured. Indeed if there is a break from the customs union we see that live exports may be the only way in which to maintain the viability of the UK sheep industry. We would cite examples of ongoing land abandonment in the Highlands of Scotland as an example of our very real concerns over the sustainability of farming and rural communities within hill areas where sheep farmers play a vital role in maintaining the social fabric and the biodiversity of these areas.

c) Currently, under the Regulation, livestock vessels (which keep animals in pens) and lorries require specific pre-approval inspections, whereas roll-on, roll-off vessels or aircrafts do not. Do you think that all transporters should be inspected and approved? If so, why?

The current legislation states that a competent, qualified person has to attend the animals during transport, this would not be the pilot of an aircraft or the captain of a ship. We would be content that consultation between the attendant and the captain of the ship or pilot would guarantee the welfare of the animals concerned, however if advice given by the attendant has been disregarded then the captain, or pilot must then be accountable for the welfare of the animals concerned.

d) What other factors should be considered and addressed to improve the welfare of animals during transport?

As stated previously, in our answer to Question 2 j) It may be of benefit to assess suitability of the transport for the species of animal being transported at the time of export, particularly where the

certificate of approval has not been issued by the competent authority in the UK. We refer to Article 18 of the regulation.

e) Do you have any other proposed UK Government policy reforms?  
Please see our answer to question 3 d

Name and contact details of the contributor to this section (the questions relating to the Call for Evidence),

Hamish Waugh  
Messrs D&E Waugh & Son  
Effgill  
Westerkirk  
Langholm  
Dumfriesshire  
DG13 ONN  
[hamish@effgill.co.uk](mailto:hamish@effgill.co.uk)

My qualification to respond to this document is as follows.

I am an extensive hill farmer, farming in the Southern Uplands of Dumfries & Galloway, I have 480 breeding ewes on 1000 acres of rough grazing with a further 140 on marginal improved pasture. For the last 28 years I have found it necessary to supplement my income, this I have done by doing part time driving for one of the largest livestock haulage firms in the UK handling between 1.5 and 2 million sheep and half a million cattle annually, over the length and breadth of the UK. Much of their work has included long distance haulage from auction marts and farms in the North of England, and much of Scotland to abattoirs right across England and Wales and Scotland. Other work will include farm to farm deliveries and farm to auction marts.

During the negotiations which led to the introduction of European Council Regulation (EC) No. 1/2005 I was asked for my opinion on several occasions by DEFRA and was in twice weekly conversations with the civil servant in Edinburgh tasked with seeing this regulation pass through the European Council in a fashion that was achievable and practical to implement. I believe in the circumstances that improvements to the old EU directive which became known as WATO 97 were both workable and brought about overall improvements to the welfare of animals being transported across the whole of the EU.

I have also been a member of DEFRA's Ruminants Expert Group which has met on several occasions to discuss issues surrounding European Council Regulation (EC) No. 1/2005.

In 2016 I was a co contributor to the European Commission, DG Sante pilot project, "Guides to Good and Best Practice." Regarding the publication of guidelines for transporting all species of farmed animals where European Council Regulation (EC) No. 1/2005 could be met and exceeded.