



FIR FARM

— Made in the Cotswolds —

## Consultation: Improvements to Animal Welfare in Transport

February 2021

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

We agree that the exporting of live animals for slaughter or fattening should be phased out. The UK should lead by example, and providing the industry is given time to adjust, any disadvantages from banning live exports for slaughter and fattening will be outweighed by the benefits.

We would also like to see live exports for slaughter phased out between Great Britain and Northern Ireland and reduced wherever possible from smaller British islands to mainland UK.

In relation to other UK islands, many of these are very keen to establish their own slaughtering facilities and with capital grants and support from regulators this could be made possible. Of course, some of the smallest island farmers may still need to make short journeys to the nearest abattoir on the mainland or another island, and exceptions could be made here.

A key prerequisite for implementing a ban on live exports is therefore to ensure the UK has sufficient provision of its own slaughtering services. We urge government to follow the recommendation in the FAWC report to review the availability of abattoirs “related to the points of production and particularly mindful of end of life requirement. This will identify where abattoirs need to be sited in order to meet the needs of farmers and to minimise journey times and thereby meet the welfare needs of animals.”

The FAWC report also recommended further research into the feasibility of mobile slaughter facilities. At Fir Farm we have been working on a project to create the first modern mobile abattoir in the UK. This has faced many challenges, financial, regulatory and bureaucratic, but we hope to begin slaughtering next month. We would be happy to discuss this project and share information with Government.

**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.**

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In principle, yes. There is no reason why all livestock should not be taken to slaughter weights and condition within the UK and slaughtered here. Doing so will have overall financial benefits for the UK livestock sector and for the balance of payments, because value will be added within the UK. However, it is first essential to ensure that adequate provision is made for farmers to slaughter livestock within the UK without having to travel long distances. To make that possible, support will need to be given for new abattoirs to be established and for existing abattoir infrastructure to be improved.

In addition, we feel that supermarkets should be encouraged to slaughter closer to the point of production, rather than insisting that all animals they purchase are slaughtered in their one, two or occasionally three designated slaughterhouses.

Now that we have left the EU, we cannot be certain of the final destination of exported animals and we also cannot guarantee the conditions under which animals for further fattening would be taken through to slaughter weights within the EU. We therefore cannot guarantee whether the UK's welfare standards, which are higher in some respects than those in the EU, will be maintained. We therefore support moves to limit exports of live animals.

**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.**

We do not export any of our animals for slaughter or fattening so would not be impacted by this change. We support local food systems wherever possible and wish to help bring about changes in food and farming systems that result in greater financial security for food producers, lower impact on the environment and the highest possible animal welfare standards. We believe all these will be benefitted by ensuring that all animals reared in the UK are slaughtered in the UK, and ideally, as locally as possible.

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

As we do not export livestock for slaughter or fattening we do not need to explore alternatives. However, we have focused in recent years on growing our market locally and find that slaughtering, processing and retailing as locally as possible adds value to our product. This is why we have started a project to build our own on-farm mobile slaughtering facility. With rising demand for meat from farm shops, farmers' markets and other local outlets, there will be further opportunities for farmers to add value in this way, providing there is adequate local slaughtering capacity.

**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.**

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While we accept the need to transport animals longer distances for breeding or other purposes, we believe these journey times are far too long for slaughtering. The Government has led people to believe that it supports the slaughtering of animals as close to the point of production as possible and the British public would not expect journeys of anything like the times proposed. Providing adequate abattoir services were available across the UK, including remote and island areas, there is no reason why journeys specifically to slaughter should not be limited to 4 hours, from point of departure. A phase-in period of up to five years would allow the critical issue of abattoir provision to be addressed and to identify where exceptions would be needed, such as for particularly remote or island locations. But wherever possible these places should be assisted to build their own slaughterhouses or mobile abattoirs.

We see addressing supermarkets and their desire to have total control of abattoirs that slaughter for them as central to the success of this policy. Cattle and sheep, in particular, are often not slaughtered at the nearest suitable slaughterhouse but many miles further away at one owned, run or controlled by a particular supermarket. However, there is no reason why several supermarkets could not have animals slaughtered at the same slaughterhouse. We feel that the Government should take a firm and decisive stand on addressing this issue.

Farmers supplying local markets need a slaughterhouse within 1 hour of their farm (about 40 miles) for economic reasons, due to the fact that at least two and sometimes three journeys need to be made to the abattoir and back, often with only a few animals at a time. This is in order to take the animals to slaughter, then a separate journey to collect the offal and a final journey to collect the meat.

As such, we urge Government, as recommended in the FAWC report, to carry out a mapping exercise of abattoirs, along with connected services such as renderers, across England and Wales which identifies services provided within those abattoirs and their capacity. The aim of this should be to understand what journey times are currently taking place and where gaps are in the provision of services, in order to facilitate shorter journey times and local slaughtering where there is a demand for it. A more distributed model of slaughtering has the added benefit of creating a more resilient food system that is adaptable to future shocks, such as Covid-19. We would also recommend more research and support be given to mobile abattoirs as a solution for areas that currently lack a static abattoir.

**Do you see a need for any exceptions to the maximum journey times and, if so, why?  
Please provide evidence.**

In principle we don't see there being any exceptions to the proposed maximum journey times given they are significant considering the size of the UK. However, some consideration should be given to sales and shows where farmers may be travelling a long way and staying for a day or more. Does the time spent at the sale or show count as part of

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the journey? If so, this could prove problematic and some exceptions could be needed. Exceptions may also be needed in the event of vehicle breakdown or similar emergencies, but the welfare of the animals in such situations should take absolute priority.

**In the case of such exceptions, what requirements should be put in place to ensure animal welfare is protected?**

If exceptions are made as outlined above then there should be strict requirements regarding water and feed provision, space to lie down, non-mixing of different animals, temperature regulation and adequate bedding.

**What would be the financial impact to your business or organisation due to new maximum journey times being implemented? Please explain any impacts provided.**

We would expect there to be some short-term adjustment and extra costs, but overall, reducing journey times for live animals will save money in transport costs and create many new opportunities to add value within the UK.

**Including loading, unloading and stops, how long is your average journey for the livestock, poultry or horses that your business or organisation manage?**

Our current abattoir is an hour's drive, but we will soon have an abattoir on-farm.

**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.**

We agree with a minimum 48 hours rest period, however, we would question why animals need to be transported further than the maximum journey times being proposed, particularly within the UK. We feel this should be avoided wherever possible. We would also suggest that rest conditions be outlined, including water and feed provision, space allowance, bedding, temperature and non-mixing of different groups of animals. This should include any period of time held at an abattoir prior to slaughter, which may be a day or more. Ideally, animals should be slaughtered as soon after arriving at an abattoir as possible. However, if animals are held for significant periods then they should be cared for by someone who has experience with stock.

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

We would support a minimum 7-day rest period. Cattle can become distressed when taken from the farm of origin. This particularly applies to those born and reared on the same farm for whom the journey to slaughter is the only one they take. Even where water and feed are provided, some cattle will not readily adjust to the unusual conditions. Some will never have



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drunk out of a water bowl before and will go thirsty, others may take time to adjust to different feed. Even a single group of animals may contain some that are higher in the pecking order than others and this can mean that some animals get little or no share of any food or water provided.

If there is a strategic network of abattoirs, including a sufficient number of smaller local abattoirs, then rest periods would not be necessary during the transportation of livestock to slaughter. For those accessing large scale abattoirs or trading livestock, the animals are often transported from farm to the market, bought by dealers and transported to a holding facility before being transported again, constituting three separate journeys. If a maximum journey to slaughter of 4 hours is imposed, we see it as reasonable for these to be treated as three separate journeys, provided there is rest between them with, at the very least, adequate water provision. Under the journey times proposed in this consultation, however, we feel these should embrace the total time since the animals leave the farm and a rest period should then follow, with conditions outlined for what such a rest period should require. However, as stated above, more consideration needs to be given to exceptions such as sales and shows.

In addition, as stated above, any period of time held at an abattoir prior to slaughter should also be given due consideration regarding welfare requirements. Ideally, animals should be slaughtered as soon after arriving at an abattoir as possible. However, if animals are held for significant periods then they should be cared for by someone who has experience with stock.

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

We support animals being transported in the right temperature to protect their welfare and agree in principle that the internal temperature should sit within the 5-25 degree range. However, we would recommend long journeys are avoided when temperatures are at either end of this scale for prolonged periods. We would also suggest further consideration is given to the impact of these restrictions on smaller producers. Short journeys in these temperatures may not be a problem providing measures are taken to protect the poultry, such as preventing wind chill. More research is needed, however, and we don't know enough to comment fully on this issue.

**What would be the financial impact to your business or organisation of prohibiting both short and long poultry journeys when the external temperature range is outside of 5-25°C? Please explain any impacts provided.**



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Fitting thermal regulating equipment will have a cost and government should consider whether financial support should be provided particularly for smaller producers.

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

We agree that journeys in temperatures of 30 degrees or above would be detrimental to the animal's welfare. However, the preventing of short journeys (over 65 km and up to, or under 8 hours) in Type 1 authorised vehicles could be complicated, and for many of those smaller scale farmers usually undertaking shorter journeys in these vehicles they are likely to be unable to afford to retrofit the required equipment to maintain the temperature above the lower threshold. This could lead to large parts of the countryside becoming a transport free zone during winter months and some parts of the summer and that could then have negative welfare consequences with animals having to remain on farms when there may not be enough food and/or space to maintain their health and welfare. Whilst we support animals being transported in the right temperature to protect their welfare, this proposal needs more consideration as to how it could impact on smaller scale farmers and some financial support may need to be given to improve vehicle temperature regulation.

Traffic congestion that brings vehicles to a standstill can be a big problem particularly in hot weather. Ventilation flaps on trailers would not be sufficient to prevent overheating. One solution would be to give priority to live animal transporters during traffic hold ups.

Cattle and sheep are well able to withstand sub-zero temperatures and transporting them in such conditions is unlikely to cause welfare problems for them, however, we are opposed to sheep travelling on a top, open deck of a lorry at below 5 degrees C, especially if they have been housed or recently shorn.

**What would be the financial impact to your business or organisation of prohibiting both short and long livestock and horse journeys when the external temperature range is outside of 5-30°C? Please explain any impacts provided.**

There would be financial cost to fitting better temperature controls to vehicles and we feel government should offer some support to achieve this.



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**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.**

Consideration should be given not only to species but to age, whether females are pregnant and to overall health.

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

Anyone moving animals should have a robust contingency plan for safeguarding animal welfare. This should include opening or closing flaps as necessary and reducing numbers during hot weather to help avoid over-heating. It would be helpful to have guidance that sets out how animals can be protected from adverse weather conditions during events such as vehicle and/or abattoir breakdowns or animal injury, as well as setting out the need to lower stocking densities on hot days and the provision of extra bedding for species such as younger pigs on cold days.

It should also be noted that welfare is not just about the length of the journey but about the competency of the driver as well as the road conditions. Better planning to ensure journeys run smoothly and that drivers do not brake, accelerate or corner excessively. Allowing livestock vehicles through any road closures where possible would also help.

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

We do not have the expertise to answer these questions. However, whatever basis is used for space allowance, then the full diversity of animal size, shape, weight and characteristics (such as horns) must be taken into account.

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

Adequate headroom so that animals are not able to touch the roof of a vehicle is essential, but too much headroom can be problematic as some animals may attempt to jump or climb across others. Due consideration must also be given to the range of animal heights, including horns.

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



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**What would be the financial impact to your business or organisation of the proposed headroom requirements for both short and long journeys? Please explain any impacts provided.**

Proposed head room changes may make some existing livestock vehicles unsuitable. If this is the case, thought should be given to support farmers in upgrading and any new regulations should not be brought in without support, particularly for smaller farms who may already be struggling financially.

**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.**

We agree that animals should not be transported in rough weather at sea. In order to avoid the need for sea journeys, islands should be supported to establish their own abattoir capacity. However, consideration should be given to how welfare is maintained should adverse weather mean livestock cannot be transported. A contingency plan should be in place for if animals are trapped on a small island without adequate feed, for example.

**What would be the financial impact to your business or organisation of prohibiting transport during Beaufort Wind Force of 6 or above? Please explain any impacts provided.**

This would not directly impact our business. However, it could have major implications for UK islands. For example, the Isles of Scilly and the Isle of Wight currently lack abattoirs and livestock must be transported to the mainland and then taken by road to an abattoir. Whilst this consultation does not consider Scotland, it must be noted that Scottish islands particularly suffer from lack of abattoir facilities and some animals are being transported hundreds of miles because of this issue. This could be resolved throughout the UK by adequate provision of either small or mobile abattoirs situated on the islands.