

# QMS Briefing

**Purpose:** *To provide advice on the impact of the DEFRA Consultation on Welfare of Animals During Transport*

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**Date:** 17/02/2021

*Quality Meat Scotland is a Non-Departmental Public Body. This advice is provided under the Quality Meat Scotland Order 2008 Schedule 1 point 18: Advising on any matters relating to the red meat sector (other than remuneration or conditions of employment) as to which the Scottish Ministers may request Quality Meat Scotland to advise and undertaking inquiry for the purpose of enabling Quality Meat Scotland to advise on such matters '. This advice is freely available and further information can be provided by the designated contact above.*

## Overview

- Quality Meat Scotland's overall strategy is to support the development of a sustainable, professional, resilient, and profitable Scottish red meat industry which makes an important contribution to Scotland Food & Drink's target of £30bn by 2030.
- Our vision, as an organisation, is to be valued by our farmer and processor levy payers and key stakeholders, as a business support organisation which delivers strongly for the Scottish red meat industry as it continues to build a global reputation for animal welfare, quality assurance and integrity.
- We have responded to this consultation by way of highlighting the grave concerns we have around our ability to continue to uphold high standards of animal welfare within our Scottish red meat industry, which we have built a world leading reputation around the application of high welfare standards and the integrity of those standards being linked to auditable whole of life, whole of supply chain quality assurance schemes.

## Live Animal Exports

**Q1: Do you agree that livestock and horse export journeys for slaughter and fattening are unnecessary? Please explain your views.**

- Yes, we agree that with strategic levels of investment in the red meat supply chain, livestock and horse export journeys for slaughter are unnecessary as the resources within the red meat supply chain exist on mainland GB to process these animals here. The red meat products deriving from these animals can still be traded into the same market that they would be entering.
- However, by banning live export, additional pigs, cattle, and sheep would require processing within Great Britain.
- In 2020, Defra slaughter data indicates that GB abattoirs handled 2.37m cattle, 14m sheep and nearly 9.3m pigs, so a ban of livestock exports for slaughter is unlikely to have a major impact on the market.
- For sheep, there could be some potential impact but, even if there was significant under-reporting and live exports from GB to continental Europe totalled 250,000 head, then that would still be less than 2% of current slaughter. To put this into

some context, there was a decline of more than 400,000 head in GB abattoirs' sheep slaughtering between 2019 and 2020.

- However, whilst we view export journeys from Great Britain to the EU or ROI are unnecessary, live export within GB (for example, from the Scottish Islands to mainland) are an entirely necessary journey that ensures our red meat supply chains benefit from efficient production in different parts of the country and are critically important journeys to enable animal welfare to be maintained within remote communities of Scotland.
- Additionally, the ability to move pigs from Scotland to processing plants in Northern Ireland is an essential contingency in case of emergency. Scotland's only large pig abattoir had a serious fire in 2017, closing for 3 months, and the Northern Irish plants were the nearest alternative facilities to minimise transport distances, and avoid over-crowding on farms.

**Q2: 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. QMS**

- Yes, as above, however some flexibility will need to be retained to account for livestock who have been exported for breeding purposes, but then have a condition that means they are no longer able to fulfil that purpose. By having a 6-month prohibition from slaughter animal welfare issues may be increased by carrying unnecessary stock on farm which could be culled quicker. So, exemptions must always apply to ensure that animal welfare is not compromised and can be upheld in every circumstance.
- Additional exemptions should also be applied in exceptional circumstances to reduce animal transport time. Should a processor face unforeseen and exceptional circumstances and the next closest processor required export to the EU, then this should be allowable to ensure that animal welfare is not compromised.
- Additionally, as mentioned above, export journeys from within Great Britain (e.g., from Scottish Islands to the mainland) are critically important journeys and should not be prohibited. No Capacity for processing exists within much of our Scottish island network, and capacity for further finishing is limited by climate and topography. Transport routes to the Scottish mainland are critical to ensure animals can be finished and processed. If this route were to be prohibited it would lead to livestock no longer being farmed in Scotland's Island communities. This would have a massive detrimental impact to Highlands and Island economies, which are largely based around livestock production, accounting for 2.5% of employment of both males and females in the Highlands and Islands in 2020, and provide 4% GVA in Island and Remote Rural areas.

**Q3: 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.**

- Yes, we agree that exceptions should be made for livestock going for further breeding or production in order to ensure that the genetic pool is not limited.

**Q4: 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. QMS**

- There would be a positive impact on QMS as an organisation, as an increase in domestic slaughtering would result in an increased levy return which is based on a levy paid per head slaughtered in Scotland. However, in order to cope with the increase of livestock slaughtering, some investment would be required in the red meat supply chain, including:
  - At farm level to ensure that additional farmers are able to finish livestock that is currently exported for further finishing. This may include investment in on farm infrastructure such as sheds and fencing, and in skills training such as for additional farm labour.
  - Based on the numbers that are currently exported live, there should be capacity within the GB processing sector, however depending on seasonality, additional investment may be required to ensure that increased throughput can be maintained, and that routes to European market are open. Brexit has increased the regulatory burden on red meat processors and has also significantly increased the costs of exporting product, so if additional livestock are to be processed that would ordinarily be placed on the European market, this would incur additional cost for our processing sector.

**Q5: What alternatives would your business or organisation explore if it was not able to export livestock or horses for slaughter or fattening?**

- QMS is the red meat levy board in Scotland that aims to promote, support, develop and protect the Scottish red meat industry. If live exports were banned then we would see additional livestock potentially being processed through the Scottish red meat industry, and thus our organisation would be required to work with the constituent parts of the red meat industry to ensure that there is capacity for that to happen, and to ensure that routes to market are available.
- With the additional sheep, cattle and pigs that are currently being exported live, minimal impact would be seen on the domestic supply of red meat. However, this is dependent on a range of factors, therefore one of the biggest challenges would be ensuring that there was sufficient demand in the marketplace for this additional product. As an organisation we would need to invest in market development to identify what markets would be available for this additional product, and that the potential routes to that market are.

#### **Maximum Journey Times**

**Q6: 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.**

- No, we do not agree with the proposed maximum journey times across all species.

- We also would point to differing types of journey, and the safeguards that already exist within the Scottish Red Meat Supply chain to ensure animal welfare is the first consideration when transporting animals.
- QMS operates the Scottish Quality Assurance schemes for the red meat supply chains in Scotland. Our quality assurance schemes cover whole of life, and whole of supply chain activities, ensuring that at every point of an animal's life, and journey through the supply chain, there is an auditable set of standards in place to ensure that the highest standards of animal welfare are maintained, thus resulting in a premium product that the consumer values. The QMS Animal Welfare and Wellbeing Charter recognises the five freedoms of animal welfare and wellbeing and is a guiding principle for all QMS assurance schemes, which are supported and approved by the Scottish Society for the Prevention of Cruelty to Animals (Scottish SPCA), Scotland's independent animal welfare charity.
- As part of our whole of life, whole of supply chain assurance schemes, only haulage operators who are approved members of the QMS Haulage Assurance Scheme or equivalent can transport cattle, sheep and pigs which are destined for the Scotch Beef PGI, Scotch Lamb PGI and Specially Selected Pork brands. Haulage drivers are specially trained to handle and transport livestock and must hold species specific certificate(s) of competence. These schemes ensure the best quality of life for these animals throughout the supply chain, resulting in the highest quality product reaching the consumer's plate and demonstrate the professional capabilities of member companies. The overall strategy of QMS is to shape a sustainable and prosperous Scottish red meat industry. A commitment to animal welfare and wellbeing is a key factor in this strategy and of paramount importance in ensuring the highest product quality.
- Scotland has a diverse and stratified livestock industry, due to its geography. The Scottish mainland is connected to a network of remote Scottish islands that have a long history of breeding animals that then move onto the mainland for further slaughter and processing. These journeys are highly regulated and pre planned due to the critical nature of them. The implication of these journeys not taking place would mean animal welfare would be compromised due to the carrying capacity of these islands being limited, thus animals would not have access to enough feed and fodder, and the economic impact would threaten many rural communities who rely on rearing livestock as part of the Scottish crofting system.
- We have provided specific comment on the journey times detailed below split down per species.
- As detailed within the table, the journey time descriptor can mean different things. Our view is that the definition of 'journey time' should mean the active moving journey, and not include time spent at market, or unloading and loading, which is subjective and variable, and should not be rushed in order to ensure the highest welfare standards can be applied.

Species	New maximum journey time limits	Comment
Pigs	18 hours	This new maximum journey time would be possible within the specific Scottish circumstances and almost all journeys currently take place within this limit.
Newly weaned pigs	8 hours	This new maximum journey time would be possible within the

		specific Scottish circumstances and almost all journeys currently take place within this limit.
Calves	(up to 9 months) 9 hours	<p>This new maximum journey time would be incredibly restrictive to Scottish agriculture and would not be possible to implement (even if we accepted major economic impact) due to the high negative impact that this would have on animal welfare. This is because of the stratified nature of Scottish livestock production, with calves under 9 months old (store calves) moving from remote rural parts of Scotland down to central auction markets where they are then moved into a finishing farm. The remote rural parts of Scotland where many of these animals start their journeys do not have sufficient capacity to grow the fodder to keep these animals, thus the result would be a net loss of livestock production from these parts of the country. The auction market system in Scotland is incredibly highly regulated, with appointed animal welfare officers, and are also audited under the QMS Auction Markets Quality Assurance Scheme that sets out specific standards that must be met as part of our whole of life, whole of supply chain quality assurance. Therefore, we would recommend that the time allocated as a maximum journey time would be the current 21 hours or 29 hours with consent from APHA. We are content that we can demonstrate and evidence the controls we have in place to ensure that animal welfare is not compromised using the current system of regulation and assurance schemes.</p>

Cattle	21 hours, (29 hours with consent from APHA).	This new maximum journey time would be possible within the specific Scottish circumstances and almost all journeys currently take place within this limit as long as time spent at Auction Markets is counted as neutral time and the 21 hours journey time is for the active journey only and does not include loading or unloading times.
Sheep	21 hours (48 hours with consent from APHA).	This new maximum journey time would be possible within the specific Scottish circumstances and almost all journeys currently take place within this limit as long as time spent at Auction Markets is counted as neutral time and the 21 hours journey time is for the active journey only and does not include loading or unloading times.

**Q7: Do you see a need for any exceptions to the maximum journey times and, if so, why? Please provide evidence.**

- Yes, pragmatism and reality need to play a part here, particularly when we consider road traffic conditions and incidents out with the control of the haulier that may inadvertently increase journey times. These include:
  - Poor weather conditions that are unexpected that require a detour to be made or speed to be reduced for prolonged periods to ensure that driver and animal safety is not compromised.
  - Road traffic incidents that close roads or require significant detours. Particularly in Scotland where we have significant livestock transport operations coming from very remote rural locations, which have few detours available if the main roadway is shut. One example of this is animals traveling from parts of Argyll, a key livestock producing area that is serviced by one main road, the A83. Due to the particular topography, during periods of poor weather, landslips can commonly occur on this road, leading to the main diversionary route adding 59 miles to the normal journey.
- The structure of the Scottish livestock system also means that time at Auction Markets needs to be treated separately- not as part of the journey time, but not as a full rest period as per questions 11 and 12. This time should be considered an exemption as part of the journey time, so that when the lorry stops at an auction market, the clock stops, but the journey has not been completed. The clock to resuming the journey should start again when animals have left the auction market site again for onward travel, thus completing their journey to their final destination.

- We base this justification on the basis that the Auction market setting is highly regulated, with appointed Animal Welfare Officers who are able to check any stock who are not able to continue their journey and advise when transport is having an adverse impact on animal welfare.
- Auction markets in Scotland are also part of our whole of life whole of supply chain quality assurance schemes which means there is an auditable set of standards that they are expected to comply with to offer reassurance to consumers around key areas of animal welfare. Key provisions within these standards include meaning that animals must have sufficient space to lay down, and that there is sufficient access to water provision. Additional provisions for animals who reside overnight (a particularly important provision for animals travelling from Orkney and Shetland to fit into ferry sailings) also are detailed meaning that animals must be fully bedded with access to appropriate fodder and water.

**Q8: In the case of such exceptions, what requirements should be put in place to ensure animal welfare is protected?**

- Ensure that drivers are not penalised for exceeding their driver's hours in exceptional circumstances.
- Ensure that during road traffic accidents, lorries with livestock are prioritised for movement first or are assessed if lorries are stacked to ensure the animals are safe and secure.
- Make provision that journey times can only be paused when animals enter an approved, assured auction market or collection centre whereby their condition is assessed by the appointed animal welfare officer. This would uphold the integrity of the safeguards that are already in place and strike a balance between ensuring animal welfare is not compromised by holding them on a breeding farm whereby fodder provision may be limited, and ensuring their welfare is not compromised by travelling longer distances.

**Q9: What would be the financial impact to your business or organisation due to new maximum journey times being implemented? Please explain any impacts provided.**

- If the new maximum journey times were implemented, then there would be significant financial impacts on the Scottish red meat industry.
  - The extent of the barriers that these maximum journey times would present would mean that in some instances it would not be economically viable, or physically possible due to implications on animal health and welfare that would arise from having maximum journey times implemented.
- For Auction Markets in particular, the impact would be financially and physically prohibitive to their continued operation and place in the red meat supply chain.
  - If time spent at Auction Markets is NOT counted as neutral time, then auction markets would be required to hold animals as per the required rest period in between journeys.
  - Most auction markets do not have the capacity, or the staffing levels to accommodate the number of animals that would be impacted, whilst continuing to operate a safe service themselves. There are also additional bio-security issues if too many animals are moving through a market at the same time, so it is advantageous

both economically, for animal welfare, and for biosecurity that animals are moved away from auction markets as soon as they are able.

- The Financial impact to individual farmers profit margins would also be affected. Moving livestock from breeding farms in remote rural parts of Scotland, to finishing farms may take several days, or weeks in some cases, with multiple rest stops required. This increases cost to the farmer.
  - QMS 2020 Enterprise costings demonstrate a net margin of -£221.57 for LFA suckler beef farms, indicating that these farmers who would be most impacted, do not have the ability to absorb more cost into their system, and as such may be forced out of business.
  - There would be an increased requirement for livestock lorries on the road, which would have a negative impact on the environment due to emissions being created by burning fuel due to additional journeys.
  - There would be an increased requirement for qualified and competent livestock hauliers, which at present there is a lack of supply of new drivers available, and an aging workforce, creating concerns that capacity does not exist to service these additional journeys.

**Q10: Including loading, unloading and stops, how long is your average journey for the livestock, poultry or horses that your business or organisation manage?**

Quality Meat Scotland undertook a survey to its Haulage Quality Assurance Scheme members to understand the range of journey times that are taken within their businesses. These times are for single journeys, i.e., from farm to auction market, as it is difficult to assemble data covering an animal's full journey as it is likely that it will cover multiple transporters as it transits through the farm-auction market-farm/processor system. Journey times are for active journeys only and do not cover time spent unloading or loading, or time spent at auction markets. The range offered by the haulage scheme members for individual journeys was from 3-12 hours.

**Q11: 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.**

- The answer to this question depends on the definition of a journey with reference to the Scottish Auction Market system. If time spent at an auction market is not counted as neutral time, and as such the second half of the journey from auction market to final destination counts as a separate journey, then no we do not agree that a new journey should not start until a minimum of 48 hours have elapsed after the previous journey. This would have a significant financial and practical impact on the Scottish livestock industry including:
  - Disruption in routes to market for store and breeding animals that are sold through the auction market system. Currently store and breeding animals are transported from a holding to an auction market where they are purchased by a new holding either that same day, or the next day, and then they are moved to this new holding.



By implementing a 48-hour rule, auction markets could not hold sales on consecutive days due to biosecurity reasons and due to not having the facilities to hold the number of livestock that are traditionally sold through the ring for 48 hours. In order to do this in a humane way, facilities would have to exist for feeding, watering, and bedding for the 48-hour timeframe, as well as requiring someone to undertake these tasks, which all come with a cost. The livestock industry in Scotland currently exists on a very low profit margin, and any additional costs (and the cost required here would be significant in terms of reduced capacity to operate and additional facilities required).

- This would create a significant barrier to trade for auction markets which play a critical role in the red meat supply chain by providing market transparency of supply and demand, helping to set a base price from which red meat prices are driven from.
- You also threaten the viability and structure to hauliers working patterns, who rely on moving animals to and from auction markets on the same day to maintain their workflows. By disrupting this you reduce existing hauliers' capacity, requiring additional lorries to operate, increasing carbon emissions and environmental footprint of operations. You also require additional suitably qualified drivers with livestock management experience, of which there is a scarce supply of that turnover of retiring drivers is struggling to keep pace of.
- Additionally, regarding pigs specifically, the abattoir at Brechin is the only facility in Scotland that can slaughter cull sows. If anything happens to it, APHA should be able to authorise journeys longer than the maximum if that is the only alternative place to move cull sows to.
- The FAWC report provides little evidence for why 48 hours is an appropriate time for resting. It is widely recognised in meat quality research that the energy levels in the muscles of livestock have returned to normal levels around 2 hours after a stressful event therefore we again feel that this recommendation is unjustified and not grounded in Science.

**Q12: Do you agree that there should be a minimum 7-day rest period for cattle? Please explain your views.**

- The answer to this question depends on the definition of a journey with particular reference to the Scottish Auction Market system. If time spent at an auction market is not counted as neutral time, and as such the second half of the journey from auction market to final destination counts as a separate journey, then no we do not agree that a new journey should not start until a minimum 7 days have elapsed after the previous journey. This would have a significant financial and practical impact on the Scottish livestock industry including:
  - Disruption in routes to market for store and breeding animals that are sold through the auction market system. Currently store and breeding animals are transported from a holding to an auction market where they are purchased by a new holding either that same day, or the next day, and then they are moved to this new holding. By implementing a 7-day standstill rule for cattle, auction markets could not hold sales on consecutive days due to biosecurity reasons and due to not having the facilities to hold the number of livestock that are traditionally sold through the ring for 7 days. In order to do this in a humane way, facilities would have to exist for feeding, watering, and bedding for the 7-day timeframe, as well as requiring someone to undertake these tasks, which all come with a cost. The livestock

industry in Scotland currently exists on a very low profit margin, and any additional costs (and the cost required here would be significant in terms of reduced capacity to operate and additional facilities required).

- This would create a significant barrier to trade for auction markets which play a critical role in the red meat supply chain by providing market transparency of supply and demand, helping to set a base price from which red meat prices are driven from.
- You also threaten the viability and structure to hauliers working patterns, who rely on moving animals to and from auction markets on the same day to maintain their workflows. By disrupting this you reduce existing hauliers' capacity, requiring additional lorries to operate, increasing carbon emissions and environmental footprint of operations. You also require additional suitably qualified drivers with livestock management experience, of which there is a scarce supply of that turnover of retiring drivers is struggling to keep pace of.
- You may also have a detrimental impact on animal welfare if journeys that could be completed with two movements (e.g., from holding to auction market to holding) suddenly require additional rest periods, and additional time, as the animal may become stressed as it must become accustomed to its new surroundings.
- At present, standstill periods are applied to holdings that have animal movements on and off in order to provide biosecurity between holdings. We would press that standstill periods applied to farm holdings, rather than individual animal provide a route to ensure animals are not continually moved on, and there is a level of biosecurity in place that can be upheld.
- Animal welfare may also be negatively impacted if they are held at locations not set up for long-term holding of animals, such as auction markets. For a 7-day period it would be expected that animals are offered a chance to get outside to graze at pasture, however Auction Markets, where most of these animals would end up being held, do not have pasture available at the scale that would be required to provide this. Therefore, the best possible outcome for animal welfare is to ensure that the animal is moved onto the final destination holding as quickly as possible rather than prolonging the period of unsettlement.

### **Thermal Conditions and Ventilation**

~~Q13: 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.~~

~~Q14: 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 5-25oC? Please explain any impacts provided.~~

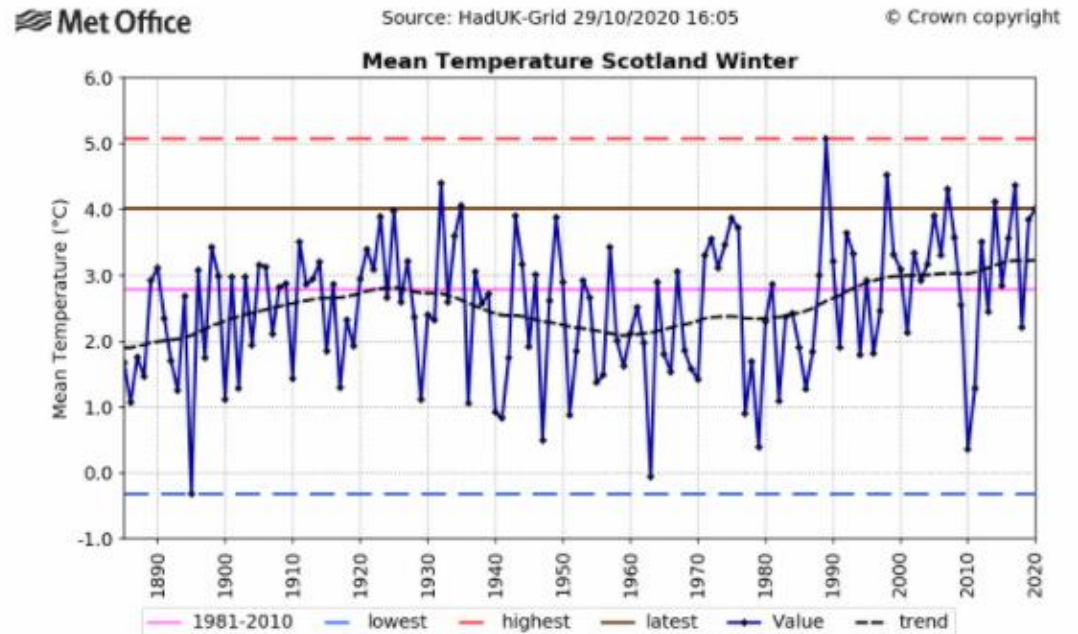
**Q15: Do you agree that we should prohibit both short and long livestock and horse journeys when the external temperature is outside of a temperature range of 5-30oC, unless the vehicle is able to regulate the internal temperature within this range for the duration of the journey by means of a**

**thermo-regulation system, and that this temperature range should be 5-30oC? Please explain your views.**

- No, we do not agree that short and long livestock journeys should be prohibited when the external temperature is outside of the 5-30oc.
  - The current EU regulation states that livestock journeys over 65km should be prohibited if the INTERNAL temperature is not maintained between 5-30oc. We feel that this current legislation provides enough of a safeguard from extreme temperatures, particularly as there is little correlation between the external temperature and the internal temperature when a livestock float is filled with livestock.
  - The consultation provides no evidence to justify this proposal. Research carried out in the Czech Republic and North America quoted in the FAWC report has no relevance to the climatic conditions in the UK.
  - The last time an Official Veterinarian complained to Scottish Pig Producers about the impact of low temperatures in Scottish pigs was in 1990 when a load had been stuck on a motorway due to a crash for six hours unable to move. Since then, we have undertaken around 150,000 journeys involving 20,000,000 pigs without complaint so there is literally no evidence of a problem that would justify such a draconian measure.
  - The FAWC report has no evidence on internal temperatures in livestock trucks. Work undertaken by Aberdeen University for SPP in 2011 showed that the internal temperature at pig level is 6-8C higher than the external temperature in winter.
  - The mean winter temperature in Scotland has hit 5oc once in the last 135 years. This would mean that if this regulation were implemented, it would become impossible to move livestock in Scotland in the winter months (January, February, March, most of April, November, and December). (*Figure 1, met office data*).

# Scotland - Mean temperature

## Winter



- The inability to move livestock during these months would pose serious issues to both farm animal welfare and farm profitability.
  - Farm animal welfare implications:
    - Animals would be impacted as the geography and topography limitations of Scotland means that many livestock farms rely in the ability to 'away winter' livestock at farms where climate and fodder is more available. This involves the transportation of sheep and cattle from around September, with them returning between January and March the following year. The inability to undertake this practice would mean that animals would not have adequate fodder on the home holding, thus reducing their body condition score, leading to productivity problems.
    - Animals are often moved during this time during adverse weather events, for example if heavy snowfall or flooding events are likely. If farmers are unable to move stock during these months, then it increases animals' risk of injury or mortality.
    - As part of good pasture management, it is advised that suitable rest periods to grazing pasture by animals are applied to enable pasture to recover and to reduce the build-up of parasites. By limiting movement of animals during the winter months, farmers will be forced to utilise pasture that would otherwise be rested, increasing the risk of the animals becoming ill from things like, but not limited to, fluke.

- Similarly, welfare issues would be seen within pig herds if movement from breeder units to rearer units or to slaughter was prohibited during the winter months. Issues would include- Pig housing is highly regulated with strict criteria for space allocations per pig. By reducing this space allocation, pigs may start to display signs of tail biting, or unnatural behaviour. Additionally, the environmental impact of having a higher stocking density of pigs than what can be reasonably carried may lead to issue with diffuse pollution.
- Farm and supply chain profitability implications:
  - If a farm business is unable to manage its pasture by resting during the winter, then livestock productivity will be impacted, leading to lower profitability. From our QMS Enterprise costings, the average net margin per head on a LFA suckler hill farm was -£221.23, and on a LFA hill ewe unit, -£22.42 per head. From this, current farm profitability margins do not have any room to be compromised further, so any change to how farmers can move and manage their stock to increase productivity would likely lead to farm businesses ceasing to exist, leading to reduced economic activity in rural Scotland.
  - Pig farms in particular would be impacted if they could not move pigs off the holding during the winter months. Due to the shorter gestation of a pig, delayed movement can quickly cause backlogs on farm. Pig farms rely on regular movement to sustain cashflow within the business. Not having regular movement would mean pigs would be less productive (as you would have to plan to block farrow rather than year-round farrowing) which is unsustainable financially. This would lead to a loss of pig farming activity in Scotland.
  - There are also implications on the profitability within the wider red meat supply chain. The red meat supply chain relies on a continual supply of livestock year-round to service a range of domestic and export consumers. If processors are unable to have stock transported to them during the winter months then they will not be able to fulfil year-round consumer demand that generates £783.5 million in turnover for the Scottish economy per year, supporting over 3000 jobs, and providing £72 million pounds of wages.
- We would support an upper limit of 30C because there is more evidence of heat stress causing problems in hot temperatures.

**Q16: 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 5-30oC? Please explain any impacts provided.**

- The Scottish red meat industry would suffer multiple farm and supply chain profitability implications. The Scottish red meat industry is a vital component of the Scottish economy, supporting 50,000 jobs, and contributing over £2 billion pounds through the wider supply chain to the Scottish economy.
- If a farm business is unable to manage its pasture by resting during the winter, or if the farm does not have suitable accommodation to house livestock through the winter months, then livestock productivity will be impacted, leading to lower profitability. From our QMS Enterprise costings, the average net margin per head on a LFA suckler hill farm was -£221.23, and on a LFA hill ewe unit, -£22.42 per head. From this, current farm profitability margins do not have any room to be compromised further, so any change to how farmers can move and manage their stock to increase productivity would likely lead to farm businesses ceasing to exist, leading to reduced economic activity in rural Scotland.
- The practical implications of this rule would also cause significant disruption, animal welfare and financial issues. For example, where an abattoir chooses to source their sheep or cattle direct off the farm. Animals will be selected on the farm and the haulage contractor is then e-mailed to pick up the lambs or cattle usually in 2 days' time or perhaps the following day. If the temperature drops below 5 degrees, the haulage contractor is either going to be coerced into loading the sheep or cattle illegally or only pick-up lambs and cattle from farms where it might be warm enough to pick them up and travel hundreds of miles to an abattoir with a part load, which is not economical nor environmentally efficient.
- Another consequence would be that lambs and cattle will then be held on farm for perhaps two or more weeks. In that time the animal WILL continue to grow, so when it is finally picked up it is going to be out of specification which means that it no longer meets the abattoirs requirements and the farmer consigning the lambs and cattle will be very much out of pocket when his animals are downgraded.
- This then creates implications on the profitability within the wider red meat supply chain. The red meat supply chain relies on a continual supply of livestock year-round to service a range of domestic and export consumers. If processors are unable to have stock transported to them during the winter months then they will not be able to fulfil year-round consumer demand that generates £783.5 million in turnover for the Scottish economy per year, supporting over 3000 jobs, and providing £72 million pounds of wages.

**Q17: 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.**

**Q18: What proportion of your current transportation vehicles have the facility to regulate temperature and provide ventilation? Hauliers survey, farm survey?**

- QMS surveyed its QMS Haulage Scheme members. From the responses received, the following % of vehicles have the ability to regulate temperature and provide ventilation:

	Sheep	Cattle	Pigs
Ventilation	83%	80%	100%
Temperature Regulation	33%	20%	50%

On top of the mechanical ventilation, all vehicles have flaps that can be open and closed to provide manual ventilation across all trailer units.

**Q19: For your vehicles which do not have the facility to regulate temperature and provide ventilation, what would be the cost of retrofitting to enable them to regulate temperature and provide ventilation?**

- For vehicles with fans fitted, vent flaps which can be fully, or half closed and insulated roofs, returns from the QMS Haulage Scheme survey estimate £4000 per trailer to put a temperature monitoring and control system to work alongside the existing fans.
- For vehicles with no temperature regulation estimate costs have been quoted from £40,000 per trailer based on a 3 or 4 deck artic trailer.
- Some hauliers when responding to the QMS survey queried whether it is practically possible to retrofit trailers as even if upgrades were available, they would impact on the usable space within the trailer, reducing headroom etc to the point where trailers no longer meet other regulations. It is likely that existing trailers would simply have to be retired (at significant financial loss), and new trailers to be purchased.
- Replacing all existing trailers with active temperature-controlled units (which do not yet exist) would mean a capital spend of at least £150,000/trailer based on current trailer costs. This assumes that a temperature regulation does not also require upgrade or replacement of the artic units or entire rigid vehicle to provide the necessary services to run these new systems. Complete vehicle replacement would require at least £300,000 of investment per vehicle.

**~~Q20: Are there any other steps that can be taken to ensure animal welfare can be maintained in extreme weather? Please provide evidence.~~**

### **Space Allowances**

**Q21: Do you agree that we should use allometric principles as a basis for future space allowance calculations? Please explain your views.**

- Allometric = science of body size and physiology. This is already the methodology used within the QMS Haulage Assurance standards where it states:
  - Livestock are not too tightly or too loosely stocked.
  - Stocking densities outlined in legislation are adhered to.
  - Adjustments to stocking density are made when required to allow for current weather conditions, journey duration, size, and category of stock.
  - The driver understands the maximum stocking capacity of the compartment and can calculate the stocking density based on the weight of the livestock.
  - The driver can verbally explain the numbers of livestock of a given weight range/category that a compartment could hold.
  - The livestock keeper is asked to provide rough weights where necessary.
  - The driver understands any deck height limitations and which categories of stock may be affected.
- We feel that allometric principles are already the basis for decision making when considering space allowances.
- However, the point we disagree on is the principle of using a blunt calculation to base this on, particularly when there are so many variables that can come into play. A calculation may not allow for specific variables such as breed, finish level, shorn or unshorn, road conditions and weight which can all influence what a stocking density should be to carry animals safely.
- Therefore, we would recommend on a basis of animal welfare and driver safety that the current system outlined in our Haulage Assurance Standards is sufficient. In addition, it should be noted that in order to haul livestock, drivers must go through regular training, and hold up to date copies of species-specific Certificates of Competence in the Transport of Animals by Road. We feel that this system is much more robust in ensuring that space allocations are made in a manner that puts animal welfare first, as the danger is if you just apply a basis calculation, you remove the need for practicable thinking about other factors, so in effect, animal welfare may be compromised, when there is already a better way to ensure animals have sufficient space to keep them safe.

**Q22: Do you think that reforms to space allowances based on allometric principles should apply to both short and long journeys? Please explain your views.**

- As noted above, we would argue that allometric space allocation is already the default used to base decisions on stocking densities. However, we do not think that a blunt calculation is sufficient or safe to base this on, and that the safeguards we have in place within our QMS



Haulage Assurance Scheme offer a much more practical and safe way to decide what is safe and what is not safe in terms of space allocation.

- Additionally, in the interests of animal welfare, any journey that leaves the farm holding or associated sub holdings should be subject to the same rules and regulations. Journeys within farm holdings and between holdings owned by the same farm business should be exempt however, as these journeys are likely to be extremely short (under 5km in most cases), however as the principle of allometric space allocation is essentially what a stockman would do anyway, it would be highly unlikely that these journeys would not use an allometric space assessment to decide on stocking densities.

### **Headroom Allowances**

**Q23: Do you agree with the proposed species-specific headroom requirements? Please explain your views.**

- No, we do not agree with the proposed species-specific headroom requirements. The current regulations state that an animal must be able to stand in its natural standing position, with sufficient space for ventilation. The current regulations rely on hauliers and farmers making a professional judgment based on their knowledge. By setting a crude level based on species, does not take into consideration within species characteristics such as breed differences (there would be a large difference in headroom between say, a Blackie ewe and a Blue Faced Leicester tup). Headroom requirements need to be carefully managed due to the risk of too much headroom causing potential injury by the animal trying to jump, and then getting stuck between the roof and another animal. We would state that the current regulations provide enough of a safeguard for animal welfare, and the implications of changing them on economics, animal welfare, and the environment, outweigh any assumed benefit to animal welfare (which is not guaranteed or scientifically proven).
- There is no evidence provided in the consultation that current trailer designs are having an adverse effect upon welfare. Abattoirs are not reporting unusual levels of bruising. Within the Scottish pig industry specifically, SPP supplied more than 220,000 pigs to one abattoir in 2020 and only 100 pigs were recorded by meat inspectors as having bruising, clearly something that can have multiple causes such as fighting or slipping on farm or in the abattoir, not just transport.

**Q24: Do you think that the proposed species-specific headroom requirements should apply to both short and long journeys? Please explain your views.**

- We do not agree that headroom requirements should be applied full stop to any journeys long or short.

**Q25: What would be the financial impact to your business or organisation of the proposed headroom requirements.**

*The impact of the proposed headroom requirements would be two-fold.*

1- Environmental

- a. For cattle, the proposed changes would have the capacity of each trailer, thus meaning to transport the same number of animals, you need twice the number of journeys. This doubles the amount of fossil fuel required, and the number of emissions associated with transporting cattle. This therefore would go against several other policy commitments, including the Scottish Climate Change Act, whereby industries are being asked to take steps to reach net Zero by 2040. Similarly, for sheep, trailer capacity would reduce by 33%, meaning that again additional journeys and fuel would have to be used to transport the same number of animals, which incurs an environmental cost that has not been considered. Additionally, lorries with additional headroom will also be restricted on some travel routes with low bridges, which means that the most direct route on the least mileage will not be able to be used. This again would increase the number of emissions associated with livestock transport and the amount of fossil fuel, which alongside an environmental cost, would also increase a financial cost to both the haulier and the farm business.

2- Economic

- a. Due to the reduction in capacity, the cost per animal to transport would rise, which with negative margins already prevalent in livestock farming, would be difficult to recoup from the farming industry. This would lead to a loss of economic activity both at farm level, if farmers are unable to move their stock, and from haulage services as many hauliers would be forced to give up as it would not be economic for them to continue to operate. Even if you were able to continue to operate with a reduced capacity, there are not enough skilled drivers with livestock experience that want to move into the industry, so creating the additional capacity would be problematic, and in many cases, not possible. If hauliers had to retrofit additional headroom capacity (and in most cases this is not possible to do), aerodynamics would change, and additional drag, and therefore increased fuel usage, would estimate to cost £600 over 3 trailers per week, which would not be a sustainable cost to be absorbed by haulage business.

**Sea Transport**

**Q26: 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.**

- Yes, we do agree that as per the current guidelines and regulations, animals should be prevented from being transported in rough weather. This is a practice that already takes place, with the ship's captain making the final call based on wind speed, direction, tides, swell and a number of other factors, whether it is safe to travel.
- We do not agree that the blunt instrument of stopping animals being shipped when Beaufort wind force is 6 or above. This is because this is not an accurate measure for how safe a sea is to travel across, and to ensure a line between animal health and welfare and

practicality, the decision on when it is safe or not to sail, MUST be retained by the ship's captain, who has undergone years of training to be allowed to captain a ship, and will have a working knowledge of local tides and conditions.

- It is estimated that more than 300,000 sheep and 40,000 cattle move from Scotland's islands to the mainland. These journeys are essential to maintain animal health and welfare, due to the lack of capacity to further finish and process these animals within the Scottish island network.
- If journeys were limited to when Beaufort wind speed was 6 or below, then this would significantly limit the number of days available to transport these animals from the islands to the mainland.
- Such is the importance of these journeys from the Scottish islands to Scottish mainland, significant investment has taken place to ensure that facilities are world leading both on the ferries, and in the lairages at either side of the journey. Specialist 'cassette' style systems have been designed so animals are not on livestock lorries when moving from Shetland or Orkney to the mainland, and animals have full access to feed and water to ensure maximum comfort.

**Q27: 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.**

- The financial implications would be the net loss of livestock farming on our Scottish Islands which would be catastrophic for the local economies which have been largely built around pastoral farming communities.
- FAWC recommend further examination into the use of micro and island abattoirs as a means to limit travel off islands for slaughter, however in many cases this would still cause a net loss of farming business as the capacity to take animals bred on the islands through to finished animals does not exist. The Scottish Government have already published a report on the potential of micro and mobile abattoirs (<https://www.gov.scot/publications/assessing-viability-sustainability-mobile-abattoirs-scotland>) and while there is large support for further development and viability studies for this, the capacity that they could handle would not match what is required, so in any instance, you are still going to have a requirement to transport animals from Islands to the mainland to ensure animal health and welfare can be upheld.

### **Exemptions**

**Q28: 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.**

- As highlighted throughout our consultation response, there should be exceptions allowed to the proposal to ban live export for slaughter and further fattening, such exemptions should allow in particular for exceptional events such as processor breakdowns or extreme market or industry events. These exports could be carried out under additional monitoring or some sort of assured export scheme where the final destination is guaranteed.
- There should always be exceptions allowed for journey times, for exceptional events, such as processor breakdowns, lack of closer suitable processing facilities, remoteness, or reliance on fitting in with ferry crossing or sale times. The industry must be enabled to put the needs of the animal first to ensure that animal welfare can be applied and prioritised.

**~~Q29: What conditions should be met in order to ensure animal welfare is protected in the case of other exceptions?~~**

**Q30: Do you think that it should be possible to obtain permission to use an exception on an ongoing basis to avoid the need for transporters to apply before every applicable journey? Please explain your views.**

- Yes, where conditions for the exception are agreed and met for each journey, we would determine that there would be no reason why a long-term permission could not be used rather than having to apply for individual journey permissions.