

# QMS Briefing

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

**Prepared By:** Sarah Millar Director of External Affairs

**Contact:** smillar@qmscotland.co.uk

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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.

## **Q.1. Do you agree with the FAWC recommendations for future research and the Scottish Government's position and proposed course of action? Please provide any further relevant information.**

- Yes, we agree that an independent evidence base should be used as a basis for designing policy interventions, and that funding should be prioritised for this purpose.
- However, we would also highlight the need for evidence to be assessed not just on the welfare of animals during transport, but also on the welfare of animals if they were not to be transported, and the impact, both economic and environmental, should barriers to transporting animals across the UK be put in place.

## **Q.2. Do you agree that prior permission should be obtained from the relevant UK authority for some journeys exporting live animals and permission should only be granted if the reasons for not undertaking a shorter alternative journey are justified? Please provide any further relevant information.**

- We would be of the opinion that with strategic levels of investment in the red meat supply chain, livestock, and horse export journeys outside of the UK for slaughter are unnecessary as the resources within the red meat supply chain exist within the UK (including NI) 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 UK 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.

**Q.3. Do you agree with the Scottish Government's position on determining fitness for transport and proposed course of action? Please provide any further relevant information.**

- Yes, we would agree with the Scottish Government's position on fitness for transport.
- 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.

**~~Q.4. Do you agree that there should be no distinction between registered and unregistered horses in future legislation on welfare during transport? Please provide any further relevant information.~~**

**Q.5. Do you agree with the Scottish Government's position on the means of transport and proposed course of action? Please provide any further relevant information.**

- QMS would recommend further extensive discussion and examination of the evidence base ahead of recommendations around certifying all vehicles being taken.
- The QMS Cattle and Sheep Assurance Standards currently state that all livestock must be transported by livestock hauliers who are approved members of the QMS Haulage Assurance Scheme, or an equivalent scheme recognised by QMS such as Red Tractor.
- Additionally, QMS members who transport their own livestock must comply with the provisions of the Welfare of Animals During Transport Council Regulation (EC) No.1/2005 including relevant documentation. Vehicles and containers must be fit for purpose, regularly maintained, kept in good, clean condition, and comply with relevant Health and Safety regulations, to avoid injury and suffering and ensure the safety of livestock.
- Regarding the use of sensory devices onboard transit vehicles, we would welcome the use of these as a tool to enhance animal welfare. However, we feel that the evidence base is not well enough developed yet around the proposed monitoring devices and would recommend that more research is undertaken to determine the appropriate impact on animal welfare.

**Q.6. Do you agree with the Scottish Government's position on the maximum time an animal may spend at market and proposed course of action? Please provide any further relevant information.**

- The structure of the Scottish livestock system means that Auction Markets are a critical component of the Scottish Livestock Industry, giving a link between buyers and sellers.
  - It should be noted that the Auction market setting is already 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 the QMS '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.

- We would agree that an improved, independent, evidence base is required to inform policy decisions going forward. That evidence base should however be holistic, and consider evidence from an economic, environmental, and animal welfare perspective, in order for informed decisions to be made.
- We note that while the ambition to start to record the time animals spend at market is laudable, this may be difficult to do in practice. Often animals can come in on one batch, and then be split up, before leaving as part of another batch, so following the stock movement could be time consuming and difficult to manage accurately. This may be easier to implement in cattle when full Bovine EID is implemented (currently delayed due to the Covid-19 pandemic).
- It should also be noted that it is not within the markets interests to slow down the movement of animals through an Auction Market, and that at all times the actions taken are to get animals moving off and through markets as soon as possible, so time limits may have adverse negative implications over the status quo.

**Q.7. Do you agree with the Scottish Government's position on space allowances for animals in transport and proposed course of action?  
Please provide any further relevant information.**

- 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 were 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.

- 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.
- No, we do not agree with the FAWC 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.

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

- Environmental
  - 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.

- Economic
  - 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 per trailer per week, which would not be a sustainable cost to be absorbed by haulage business.

**Q.8. Do you agree with the Scottish Government's position on transport practices and proposed course of action? Please provide any further relevant information.**

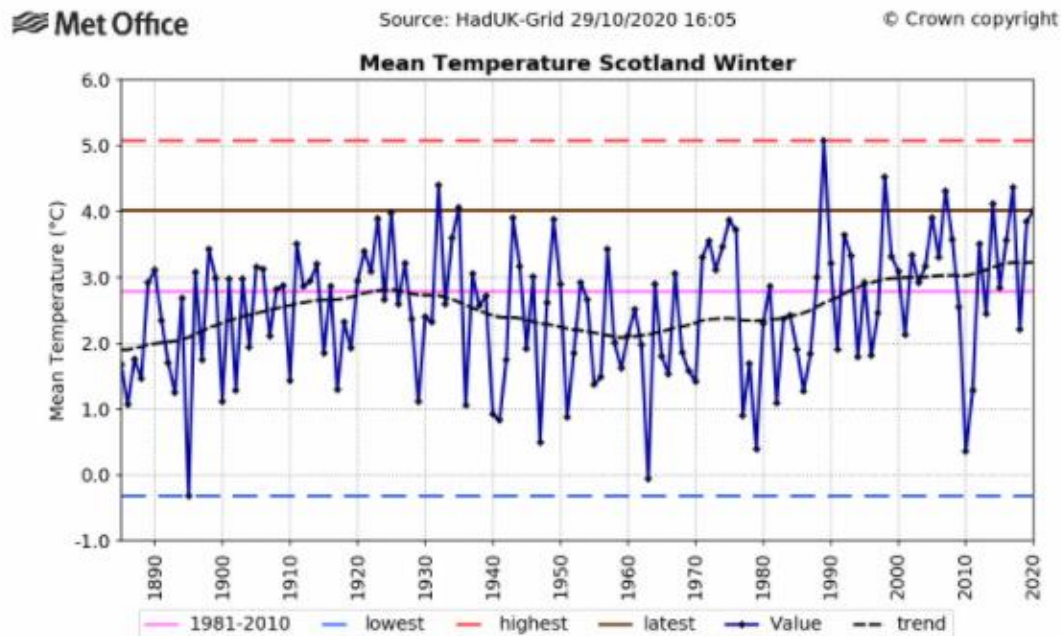
- QMS agrees with the principle that all animals of the same species should be afforded the same level of minimum protection regardless of the purpose of their movement, commercial or otherwise.
- Should future proposals to introduce Certificates of Competence be made, the necessary support and facilitation of this training and its associated costs must be met fully in advance of any introduction in order to give the industry time to adjust. The boundaries of statutory regulation must be fully assessed to ensure that there are no unnecessary barriers to trade that limit how the industry can operate.

**Q.9. Do you agree with the Scottish Government's position on thermal conditions and ventilation for animals in transport and proposed course of action? Please provide any further relevant information.**

- No, we do not agree that minimum temperature limits based on external temperatures should be applied.
  - 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.

**Q.10. Do you agree with the Scottish Government's position on maximum journey length and proposed course of action? Please provide any further relevant information.**

- 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.

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</p>

		regulation and assurance schemes.
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.

**Q.11 Do you agree with the Scottish Government's position on mid-journey breaks and proposed course of action? Please provide any further relevant information.**

- Yes, we do agree in principle with the Scottish Governments pragmatic course of action around rest periods, aligning these with drivers' hours.
- Defining what constitutes a rest period is critical. We would recommend that time spent at Auction Market be counted as 'neutral time' and as a mid-journey rest period.
  - 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.

**Q.12 Do you agree with the recommendation that anyone who transports livestock, poultry or horses should require transporter authorisation and a Certificate of Competence, including if they only transport animals on short journeys? Please provide any further relevant information.**

- We do not agree that anyone who transports livestock, poultry or horses should require transporter authorisation or a certificate of competence.
  - The QMS Quality Assurance Scheme already covers animal transport, and provides we feel the proportionate standards and verification covering farmers own transport and short journeys.
  - An extract from the QMS Cattle and Sheep Standards states:
    - 'Members transporting their livestock must comply with the following requirements:
      - JOURNEYS UP TO 65KM
        - Complete an Animal Transport Certificate (ATC) and retain this for 6 months.
          - Note: This does not apply to farmers transporting their own animals in their own means of transport on journeys up to 50km from their own holding.
      - JOURNEYS OVER 65KM AND UP TO 8 HOURS As above plus:
        - Hold a short journey (Type 1) transporter authorisation.
        - Hold a valid/relevant certificate of competence. LONG JOURNEYS OVER 8 HOURS As above plus:
          - Hold a long journey (Type 2) transporter authorisation (instead of Type 1)
          - Hold a Welfare in Transport Vehicle Approval Scheme certificate of approval and inspection, for the vehicle and container being used.
        - Maintain a journey log to include place of departure and destination; date and time of departure; origin and owner of the livestock; expected duration of the journey.
- We feel that the above sufficiently covers and gives guidance and standards to ensure that high standards of animal welfare during transport is applied for short journeys using the farms own transportation equipment.
- For Longer journeys using professional Livestock Hauliers, we would point towards the systems and safeguards that are already in place to ensure high standards of welfare and auditability of competency that are in place.
- As part of the QMS 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.

**Q.13 Do you agree with the Scottish Government's position on transportation of animals by sea and proposed course of action? Please provide any further relevant information.**

- 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.

**Q.14. Do you agree the Scottish Government should consider the proposed review on research into transportation by rail or air alongside other research priorities? Please provide any further relevant information.**

- Yes, we would support any additional independent research that may provide an economic, environmental, and animal welfare benefit to the red meat industry in Scotland.

**Q.15 Do you agree with the Scottish Government's position on the collection and use of feedback to identify welfare risks in transport and proposed course of action? Please provide any further relevant information.**

- Yes, we agree that feedback and discussion on best practice on welfare of animals during transport is a positive step.

- We would offer the use of our QMS Haulage Industry Group as an appropriate forum for discussion and feedback and for sharing of best practice between constituent parties.

**Q.16 Do you agree with the Scottish Government's position on the enforcement of welfare of animals in transport and proposed course of action? Please provide any further relevant information.**

- Yes, we agree with Scottish Governments position.

**Q.17 Do you agree with the Scottish Government's position on post-export protection of animal welfare and proposed course of action? Please provide any further relevant information.**

- Yes, we do agree with the Scottish Governments position, and would point to the following:
- Yes, we agree that with strategic levels of investment in the red meat supply chain, livestock, and horse export journeys outside of the UK for slaughter are unnecessary as the resources within the red meat supply chain exist within the UK (including NI) 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.