

The Animal Welfare Team  
Area 5B  
Nobel House  
17 Smith Square  
London SW1P 3JR

SENT BY EMAIL ONLY TO: [animalwelfare.consultations@defra.gsi.gov.uk](mailto:animalwelfare.consultations@defra.gsi.gov.uk)

22 May 2018

Dear Sirs

**Re: A call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU**

The Countryside Alliance works for everyone who loves the countryside and the rural way of life. Our aim is to protect and promote life in the countryside and to help it thrive. With 100,000 members and supporters across the UK we are the only organisation working across a broad range of rural issues.

Whilst the terms of reference for this consultation, and key questions for consideration by the Department, are beyond our main areas of policy interest, we recognise the importance of exporting animals for many sectors of the farming industry and rural economies. I therefore hope you will accept this letter as written evidence on behalf of the Countryside Alliance.

We welcome the opportunity to review the regulations for the transportation of animals, made possible by leaving the EU. However, any changes to the existing requirements should be based on principle and evidence, and recognise that divergence from EU regulations may put farmers at a competitive disadvantage to those in Europe. The Government should also use the opportunity of leaving the EU to look at ways of supporting small and medium size abattoirs which would be a more effective way of helping to reduce journey times from production to slaughter, rather than banning live exports.

**Principle and evidence**

We welcome the commitment from the Government to ensure that the regulations around animal transportation and export reflect the latest scientific and veterinary knowledge. We hope that no decisions will be taken until the research commissioned by Defra has reported and the Farm Animal Welfare Council (FAWC) has had the opportunity to consider the latest evidence.

We are aware of many campaigns on this issue and the consultation document makes reference to an e-petition on Parliament's website calling for a ban on live exports for slaughter, and which was the subject of a Westminster Hall Debate earlier this year. The petition uses highly emotive language, stating "animals are crammed into unsuitable transport and endure gruelling journeys heading for conditions illegal in this country"<sup>1</sup>, despite us being unaware of any evidence to suggest that transportation over water is of greater risk to animal welfare than transportation over land. It is vital that policy on animal welfare is based on evidence and not emotion.

It is vital that the Government adopts a coherent and principled approach in this area. The Private Members' Bill in the name of Rt Hon Theresa Villiers MP - Live Animal Exports (Prohibition) Bill - seeks to ban the export of farm animals that are kept or bred for the production of food, wool or skin. The Bill would make it an offence for an animal to be transported over water for international journeys, such as from Dover to Calais, but not journeys over water within the UK, such as from Liverpool to Belfast, without any evidence to justify this distinction. It is also unclear why the proposed ban would be conditional on the purpose for transportation, and excludes transport for breeding. We strongly

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<sup>1</sup> <https://petition.parliament.uk/petitions/200205>

encourage the Government not to endorse this approach, and ensure that principle is at the heart of the UK's approach to regulation in this area outside of the EU.

### **Fair competition**

The Government should acknowledge that any further restrictions on the transportation of animals are unlikely to be adopted by the EU which could put UK farmers and producers at a competitive disadvantage to those in Europe. This would be particularly harmful in the case of a ban on live exports as farmers and producers from countries within the EU would still be able to access our domestic market whilst UK farmers and producers would not be able to access the European market. If the Government does decide to pursue a ban on live exports then this should be negotiated with the EU with the aim of producing a bilateral agreement to ensure the market is not distorted.

The Government should also acknowledge that any ban on live exports would have a disproportionate effect in different parts of the country and on different sectors of the farming industry. A ban would be most detrimental to farmers in South East England as well as farmers who trade with Ireland. From the Government's own figures, a ban on live exports would have a far greater impact on sheep farmers with almost 500,000 animals exported to the EU in 2016. Combined with other uncertainties around leaving the EU, such as our future trading relationship with Europe and the loss of direct support payments, the prospect of a ban on live exports is another concern for livestock farmers.

Whilst current efforts are focused on live exports, the Government must resist any attempt to ban or disrupt the import of animals. This trade is important for many sectors of the rural economy, including shooting and the game market. The majority of shoots in this country rely to some extent on reared gamebirds and many shoots import gamebird eggs or chicks from countries within the EU. At present, approximately 50 percent of pheasants (14 million) and 75 percent of redleg partridges (5.3 million) reared and released in this country come from eggs or chicks imported from countries within the EU. It is important that these imports are able to continue in order to ensure that shoot providers have a range of options for sourcing gamebirds.

### **Support for smaller abattoirs**

We support the Government's objective of slaughtering animals as close as possible to the point of production. One of the main obstacles to this is the lack of abattoirs in the UK, particularly small and medium size facilities which play a pivotal role in the local food economy. They provide small scale slaughtering services to livestock farmers allowing them to participate in farmers' markets, sell in local shops as well as their own farm shops, which all helps to reduce food miles.

There are a number of factors for the decline in the number of small abattoirs but one of the main reasons has been the regulatory demands of the EU. Abattoirs have been subject to increasing regulation since the UK joined the Common/Single Market in 1973, particularly with the introduction of EU Directive 91/497/EC which imposed prohibitively expensive structural and procedural changes. Many smaller and medium sized facilities were unable to meet the costs involved, and closed. Although the law has subsequently changed, abattoirs still face very high operating costs associated with regulation and this now also includes the cost of installing mandatory CCTV. Regulations are important but these must be streamlined to reduce the burden on businesses and leaving the EU provides the opportunity to do this.

Fewer, larger abattoirs mean that many animals have to be transported over greater distances for slaughter. Large parts of South East England are now devoid of abattoirs and, in some cases, travel to Europe may well be the best option for slaughter.

As well as considering proposals to limit or ban the transport of live exports for slaughter as we leave the UK, the Government should also explore options for how to use the opportunity of leaving the EU to support small abattoirs. The establishment of more small and medium sized facilities would be a more effective way of helping to reduce journey times from production to slaughter, rather than simply focusing on international transportation.

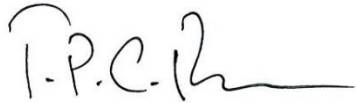
### **Priorities**

We would also question why this issue is a priority for the Department at this time, given that we do not know the arrangements for our departure from the EU, the nature of any transition period, and our future relationship with Europe, which may determine what we can do in this area.

The priority for most livestock farmers is ensuring trade with the EU remains free and as frictionless as possible and any regulatory changes to transportation of animals should not impede that objective.

Please do not hesitate to contact me if the Countryside Alliance can be of any further assistance in this consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T.P.C. 12' followed by a long horizontal flourish.

**Tim Bonner**  
Chief Executive