



Long distance live transport and the transport of animals to the continent

Overview

The RSPCA believes that animals suffer during long distance live transport and supports a 'carcass only' trade. Animals have often been crammed into trucks on UK roads for hours before facing a gruelling channel crossing of up to another six hours before heading for conditions illegal in this country.

The RSPCA wants to see:

- **An end to long-distance transport of live animals in favour of a 'carcass-only' trade**
- **A maximum eight-hour journey time for all animals travelling for slaughter or 'further fattening' across the EU**
- **Amendments to existing legislation that allow ports to refuse the cruel trade in live animals**
- **While the trade continues, for the full costs of veterinary and Animal Health regulatory inspections as well as lairage and emergency facilities to be borne by the hauliers, rather than by the taxpayer.**

Introduction

European rules on the live animal transport of animals agreed in 2005 (Regulation 1/2005/EC) and implemented in England by the Welfare of Animals (Transport) (England) Order in 2006 lay down general conditions for the transport of animals, including that they should not be transported so that they are caused injury or suffering, and give specific rules on journey times for animals and the authorisation process for transporters, vehicles and ships.

Journey times vary according to different species. Whilst there is an eight hour maximum journey time, this can be extended if the vehicle meets a number of additional standards such as ventilation systems maintaining a range of temperatures from 5°C to 30°C, a navigation system to record the journey times and appropriate bedding and food. Maximum journey times vary from 19 hours for calves to 24 hours for horses and pigs and 29 hours for sheep before a 24 hour rest is required. Following this rest other journey times can be taken until the final destination is reached.



What is the present situation on the long distance transport of animals?

The live transport trade in calves from the UK to other countries was virtually brought to a halt for about a decade (1996–2006) by the outbreak of BSE. The total numbers of all farm animals exported from the UK for slaughter or further fattening has been slowly declining from 752,000 in 2000 to 437,000 in 2009, with over 70% of these being sheep. In 2012 around 30,000 sheep will be transported through Ramsgate. Trade in calves has also been impacted by concerns from certain importing countries about Bovine TB but resumed in 2007 when 93,000 calves were transported to the continent, a figure which steadily declined to just under 7,000 in 2009 and is expected to be around 6,000 in 2012. This trade has declined as it has become more economic to keep and raise the calves in the UK.

What are the concerns of the RSPCA?

The trade in live animals changed to Ramsgate from Dover in May 2010 as the loading bay in the port of Dover had been damaged. One sailing occurred in 2012 from Ipswich when the port owners closed Ramsgate. The RSPCA has sent inspectors to inspect all vehicles passing through Ramsgate in April 2012 after consulting with Thanet District Council, the owner of the port, which gave permission for our inspectors to be present.

Although the RSPCA has no statutory powers it was initially able to inspect all vehicles going through the port. Animal Health, the statutory body responsible for carrying out animal welfare checks at ports and at loading, carries out risk based inspection which means that a third of vehicles are inspected. The RSPCA has inspected 15 sailings and 60 vehicles from two ports (Ramsgate and Ipswich) in the five month period to the end of September 2012. Since October although RSPCA inspectors are still present at Ramsgate, inspections have become more difficult to undertake on every vehicle as the transporters have closed down the shutters on the vehicles, and Animal Health have not informed us of sailings. As the RSPCA has no statutory powers, it is difficult to properly inspect vehicles unless we have the cooperation of Animal Health.

The RSPCA concerns fall into five main areas:

1. The condition of the ship being used to cross the channel, the *Joline*.

This is an old Russian tank carrier that was used as a river ferry and has been upgraded for ocean transit. It can transport up to six articulated lorries at a maximum speed of 8 knots. As it is flat bottomed with a shallow draft, it is more exposed to poor weather conditions. Its travel is therefore limited to wind conditions below Force 6 (the SCAHAW report into the welfare of animals during transport in 2002 recommended to the EU Commission that journeys of Ro-Ro ferries should not be permitted in wind conditions above a Force 5).

However, on 21 November 2012, it was allowed to set sail for Calais and had to return to port some four hours later, as the weather had deteriorated and the sea was breaking across the vessel. As the vessel is slow there is little flexibility in the time taken to cross to Calais (four and six hours) and the maximum journey time limit for transport of calves (nine hours after their one hour statutory rest requirements at the port). In another sailing, adverse weather warnings held the boat at Ramsgate for two hours and the lorries were in danger of exceeding their nine hour limit allowed before the 24

rest period occurred. The sheep that were on the ferry on 21st November had to be rested for 24 hours as they had reached their maximum journey time. They were then exported on 23rd November. When the Joline sailed from Ipswich the 15 hour journey time meant that the sheep were also close to their maximum journey time allowed .

2. The conditions used to transport the animals over long distances

The RSPCA would prefer to see a carcass trade rather than a live trade and believe that a journey time of eight hours should be the maximum allowed.

The RSPCA has issued six warning notices to vehicles involved in the trade through Ramsgate in the six month period it was inspecting every vehicle for infractions. One vehicle had to have all its sheep offloaded and 46 subsequently had to be euthanized due to lameness or other problems. Another vehicle has been refused to continue its journey as it had a tyre problem.



Since September 2012 all animals being transported are subject to a system of supervised loading (we are unsure what supervised loading actually is, and have suspicions that welfare problems will be missed because of the need for expediency), and inspection by Government inspectors at the control post. As this occurs a matter of hours before the vehicle reaches the port, official inspections are limited or non-existent at the port. The RSPCA believes that welfare problems can arise in the interim period, and further inspections should occur at the port. One animal had to be euthanized due to a ripped horn found by RSPCA inspectors at the port, despite it being in the period when supervised loading was occurring.

3. The unloading facilities required at ports

Council Regulation (EC) No 1/2005 states that in the case of emergencies (Article 23) the animals should be able to be transferred to another means of transport, returned to their place of departure or be unloaded and held in suitable accommodation. Breaches of the Animal Welfare Act 2006 may also ensue if the provisions of the Regulation are not complied with. The RSPCA has issued a report stating that ten issues need to be provided at a port to comply with Article 23 including covered lairage area to accommodate all animals, adequate flooring and isolation areas. The RSPCA has conducted visits to Ramsgate, Ipswich and Newhaven and the evidence collated shows that these ports do not meet such standards.

4. Enforcement

The RSPCA is concerned that enforcement of existing live transport laws is lacking in many Member States, including the UK. The European Commission's own report into live transport states that effective enforcement remains a major challenge. However the Commission has decided not to review or amend Regulation 1/2005 but to focus on improving enforcement, although how it will achieve this remains unclear.

The RSPCA also has concerns that the animals are going to conditions illegal in this country. For instance the calves sent abroad in 2012 have mainly been destined for Spain, where standards for housing calves are below those in the UK, in particular, the provision of bedding for the animals. The sheep in the trade are probably destined for France and many were transported for the Eid festival following Ramadan. As agreement on updating the EU labelling laws has not been reached, it is legal for an animal being slaughtered in France to be labelled as *produce of France* despite it spending the majority of its life in the UK. It is hoped that the country of origin law currently being discussed by the European institutions will prohibit this.

5. Ports should be able to choose

Under the 1847 Harbours, Docks and Piers Clauses Act ports are limited in their ability to stop the live animal trade occurring through their port. The RSPCA believes that if the port owners do not want the trade going through their port because they do not have the facilities, or there is public demand for the trade to stop, they should be allowed to stop the trade.

Conclusion

The RSPCA believes that the trade in animals should be a carcass only one. Indeed over 80% of the trade is already in this format. The trade in live animals only continues for a small number of reasons:

- port owners are not able to choose whether to stop the trade,
- confusing labelling rules means that animals can be passed off as being from the country of slaughter rather than the country of production, and
- because the full economic costs of the trade including enforcement costs do not fall to the trader or exporter.

The RSPCA believes that given the current set of circumstances within the UK, the long distance transport of animals can never be properly enforced. Whilst the European Commission has decided not to make any changes to the present legislation, the UK should use current legislation which allows it to set higher standards than the Regulation in order to help safeguard animal welfare, whilst proactively encouraging a carcass-only trade.