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## Executive summary for the NFU's response to the poultry related elements of Defra's 'Improvement to animal welfare in transport' consultation

### Key proposals from the consultation that affect poultry:

- Limit on journey time for broiler chickens to slaughter of four hours
- Limit on journey time for recently hatched chicks of 21 hours (24 hours with APHA permission)
- Minimum rest period of 48 hours between journeys for all poultry
- Prohibit all poultry journeys when outside temperature is lower than 5°C or higher than 25°C (unless the vehicle is capable of actively regulating internal temperature)
- Prohibiting all live animal transport by sea if Force 6 or higher on Beaufort scale is forecast

### Main points from our overall response:

- The proposals not evidence based
- There is no evidence of demonstrable benefit to animal welfare
- The supply chain would suffer significant disruption and cost (without measurable benefit to welfare)
- Asking government to re-think any policy proposals and work with industry to identify opportunities for improvement based on latest science and evidence
- Emphasising the practical implications of the proposals supported by up to date industry data and specific case studies

### Further detail from our response for the key proposals:

#### Journey times and rest periods

The NFU does not agree with the proposed changes to journey times for broiler chickens and recently hatched chicks, or the minimum rest period of 48 hours for all poultry. The research used to justify these proposals is 20-30 years old and is therefore misleading as it is not representative of current industry practice. There is no evidence to show that these proposals will have a measurable impact on animal welfare but would in fact create significant cost and disruption to the supply chain and ultimately consumers as well as other unintended consequences. We make the following key points in our response, backed up with up to date industry figures and case studies:

- Including loading and unloading times in the total journey time could have a negative impact on bird welfare by putting time pressure on bird handling on farm and at the processing plant
- Some existing poultry farms and processing plants will cease to be commercially viable
- The proposals do not allow for emergency contingency planning due to adverse weather/Covid-19 impacts/processing plant breakdown etc
- The proposals would effectively make it impossible to export live chicks which would mean it was unviable for globally leading breeding companies to remain in the UK
- For birds returning to farm due to a significant supply chain emergency, the minimum rest period proposed could lead to stocking density breaches, which would exceed legislative limits and have a detrimental impact on bird welfare
- The proposals would have far reaching consequences throughout the supply chain and would affect the ability of British poultry processors to maintain consistent supplies of fresh chicken to retailers and the food service sector which could lead to food availability issues for consumers



### External temperature conditions

The NFU does not agree with the proposed ban on poultry journeys when the forecasted external temperature is lower than 5°C or higher than 25°C. There is no recommendation within either the FAWC report or the systematic review relating to external temperatures and we welcome FAWC's suggestion that further research is required in this area before any changes to policy are proposed. The impact on the UK food supply chain would also be significant. At certain times of year, delays to processing caused by this proposed change would quickly result in empty supermarket shelves and a shortage of fresh poultry meat. In the medium to longer term this policy would reduce the production and availability of both table eggs for consumers and hatching eggs for breeding.

We make the following key points in our response, backed up by up to date industry figures and case studies:

- Current legislation and available scientific research states that it is the thermal conditions within the vehicle that affects animal welfare; it is this principle that the poultry industry has applied in developing its current welfare standards
- The impact to the UK poultry industry of prohibiting both short and long poultry journeys when the external temperature range is outside of 5-25°C would be significant
- In the last 20 years there would have been an average of 56 days each winter where no animals could travel in the UK if the minimum external temperature of 5°C had been in place
- This proposal would therefore result in significant periods of time each winter where no poultry would be able to be moved around the country which would make the operation of many poultry businesses and ancillary companies such as catching and vaccination teams unviable
- If birds are not able to be transported as planned there would be significant animal welfare impacts resulting from increased stocking rates and availability of feed. The UK poultry industry already has robust, tried and tested standard operating procedures in place to safely transport poultry in different weather conditions. Defining appropriate steps to take to protect bird welfare in extreme weather conditions should be evidence based and involve thorough analysis of the latest available data.

### Sea conditions

The NFU does not agree with the proposed ban on poultry transport if the wind is Beaufort Force 6 or above. The FAWC report and systematic review contain no reference to poultry welfare during sea transport and provide no evidence or recommendation for restrictions to be applied to the current regulations in relation to poultry. If this proposal was to apply to poultry it would cause significant negative welfare consequences, particularly in relation to transport of recently hatched chicks, ducklings and turkey poults. Any delay to sea transport will result in a significant and unnecessary extension of overall journey time.

### **Conclusion:**

It is clearly recommended in the FAWC report and supporting evidence that further research is required to determine what the maximum journey times and thermal conditions for each species should be. This process should be carried out in partnership with key industry stakeholders within the poultry industry including the NFU before specific changes to legislation are proposed.

We believe that appropriate science and evidence, which is based on relevant and current industry practice should be used to inform any future policy proposals.

We are extremely concerned about the impact these proposals would have on the poultry supply chain and the lack of any demonstrable improvement in animal welfare.