



475 Antrim Road      T: 028 9037 0222  
Belfast                      E: info@ufuhq.com  
BT15 3DA                  W: www.ufuni.org

Contact: Daryl McLaughlin / Geoff Thompson  
E-mail: [dmclaughlin@ufuhq.com](mailto:dmclaughlin@ufuhq.com)  
[geoffthompson@ufuhq.com](mailto:geoffthompson@ufuhq.com)  
Ref: PLY/DML

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

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#### **FROM THE PRESIDENT**

#### **Ulster Farmers' Union- submission to consultation on “A call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU”**

The Ulster Farmers' Union (UFU), which represents around 11,500 farming families in Northern Ireland, would like to provide the following submission.

***Q1a) What species of animal(s) do you transport? What volumes, how often and for what purpose i.e. slaughter, production or breeding?***

Northern Ireland has a diverse agri-food industry. The main species of farmed animals which are exported live are cattle, sheep, pigs and poultry. The data presented below represents the average annual figures for 2015, 2016 and 2017 of the number of farmed animals exported from Northern Ireland. If there was not competition for these animals from export customers we expect that the value of these animals would decline considerably and this would adversely impact farm income. Competition for livestock is essential to generate the best possible price for the livestock and to help sustain farm income. The table below outlines the total export of cattle and sheep from Northern Ireland to the Republic of Ireland, Great Britain and 'Other' European Member States. The categories are broken down into direct slaughter (DS), further production & breeding (FP & B). It is difficult to get accurate data to differentiate between further production and breeding for cattle and sheep. DAERA does not publish export data for pigs, while poultry export data is classified.

## CATTLE AND SHEEP LIVE EXPORTS FROM NORTHERN IRELAND 2015-2017

Category	2015 Cattle Exports	2016 Cattle Exports	2017 Cattle Exports	3 Year Average
FP & B	36,745	36,141	33,161	35,349
DS	21,543	17,639	12,378	17,187
<b>Total</b>	<b>58,288</b>	<b>53,780</b>	<b>45,539</b>	<b>52,536</b>
Category	2015 Sheep Exports	2016 Sheep Exports	2017 Sheep Exports	3 Year Average
FP & B	100,842	125,363	132,396	119,534
DS	333,014	394,696	402,931	376,880
<b>Total</b>	<b>433,856</b>	<b>520,059</b>	<b>535,327</b>	<b>496,414</b>

***Q1b) When transporting animals within the UK, what are your average journey durations?***

Journeys within Northern Ireland will normally take no more than 3 hours. Most journeys from Northern Ireland to destinations in Great Britain will be completed within 8 hours. Member States are currently permitted to grant a derogation for transport by road in respect where the journey is not to exceed 12 hours to reach their final destination in order to take into account the remoteness of certain regions from the mainland of the EU community.

***Q1c) Do you buy or sell animals at market? If so, how long does it take to transport animals to or from the market? How long do animals on average spend in the market?***

Northern Ireland has an excellent network of livestock markets which are easily accessible to farmers. Every farmer in Northern Ireland will be within 1 hour of a livestock market and at most will travel 3 hours to a livestock market. There are approximately 30 livestock markets which do regular commercial business, while there are also seasonal markets for breeding sheep in the autumn. Livestock on average might spend 4-6 hours in a livestock market.

***Q1d) When transporting animals within the UK, does the journey involve road, rail air or sea?***

Northern Ireland regularly will transport livestock across the Irish Sea to Great Britain for slaughter, further production and breeding. These transport routes carry livestock to valued customers in Great Britain and often to higher value markets than which are available in Northern Ireland. In the 2015-2016 House of Commons Environment, Food and Rural Affairs Committee report on Farmgate Prices the regional price disparities within regions of the UK was recognised as a concern. These price disparities continue to be clearly evident between Northern Ireland and higher value markets in Great Britain where a better price is paid for livestock. It is therefore essential that farmers have access to these markets to avail of better prices. Competition from GB customers for Northern Ireland livestock undoubtedly helps to lift prices at the farmgate which is invaluable, particularly in the economically vulnerable cattle and sheep sectors.

***Q1e) Do you export animals outside the UK?***

Yes, Northern Ireland is the largest exporter of livestock in the United Kingdom. This trade is managed in strict accordance with the European transport regulations. The extent of the trade with Europe is documented below:

### 3 YEAR AVERAGE DATA FOR CATTLE LIVE EXPORTS FROM NORTHERN IRELAND TO OTHER EU MEMBER STATES

DS Cow exports to ROI	9606
DS Prime cattle exports to ROI	1521
FP Cattle over 7 months to other EU Member States*	73
FP Cattle over 7 months to ROI	1844
FP Weanlings to other EU Member States*	2566
FP Weanlings to ROI	95
FP U42 days to other EU Member States*	19863
FP U42 days to ROI	57
<b>EU Totals</b>	<b>35625</b>

\*The vast majority of exports to other EU Member States are to Spain. U42 (Under 42 days).

### 3 YEAR AVERAGE DATA FOR SHEEP LIVE EXPORTS FROM NORTHERN IRELAND TO OTHER EU MEMBER STATES

FP Sheep exports to other EU Member States**	3565
DS Sheep exports to ROI	376445
FP Sheep exports to ROI	48136
<b>EU Totals</b>	<b>428146</b>

\*\*Exports to other Member States are mainly to the Netherlands, Belgium and France.

Livestock will be exported daily to markets in other European Member States for slaughter, further production and breeding. Our largest cattle live export market is Spain. This is an extremely valuable market for young dairy bred beef animals which go for further production. If this market was not available the reality is that these animals would be worth very little to the domestic market and many of these calves would be shot at birth. If the Spanish market was removed a percentage of young dairy bred beef animals would be retained for domestic beef production, however this would oversupply the local market and suppress farmgate prices.

The second largest live export market for cattle outside the UK is the Republic of Ireland. The Republic of Ireland is a high value market for cull cows and as such provides much valued competition for these cows at the end of their productive life.

As regards sheep, Northern Ireland is a significant exporter of sheep for slaughter and further production in the Republic of Ireland. While there is processing capacity in Northern Ireland to slaughter these animals, two leading processors have ceased sheep slaughtering in recent years for commercial reasons so they can solely focus on cattle which are more profitable to their business. As a result between 40% - 50% of the lambs produced for the food chain each year in Northern Ireland are now exported live for processing in the Republic of Ireland. Clearly this is a very important market for farmers but it also ensures that processing plants in the Republic of Ireland can operate at their maximum capacity to deliver a more efficient

service. This is further reflected by the number of lambs which are exported to the Republic of Ireland for further processing.

At certain times of the year, particularly approaching religious festivals there is also keen export demand from other countries in Europe for Northern Ireland lambs. Destinations include Belgium, the Netherlands and France.

Northern Ireland also has an excellent reputation for breeding high quality breeding livestock and these animals have been exported to a wide range of countries across the European Union. These markets are growing with social media in particular playing an important role in the marketing of Northern Ireland livestock abroad.

***Q1f) When transporting animals to other EU Member States, what are your average journey durations?***

Live exports to the Republic of Ireland from Northern Ireland will be completed well within the 8 hour limit for long journeys and on average will be around 4 hours.

Live exports to Spain from Northern Ireland will take up to 53 hours. This timeframe will include the mandatory rest and feed stops for the animals.

***Q1g) When transporting animals to other EU Member States, does the journey involve road, rail, air or sea?***

Journeys from Northern Ireland to the Republic of Ireland are all road journeys. Journeys from Northern Ireland to EU Member States in mainland Europe will be by road and sea.

***Q1h) If transporting animals to third countries, what are your average journey durations?***

N/A

***Q1i) if transporting animals to third countries, does the journey involved road, rail, air or sea?***

N/A

***Q1j) Do you import animals?***

Northern Ireland imports cattle, sheep, pigs and poultry for slaughter, further production and breeding on a daily basis. The following data is available from DAERA for cattle, sheep and pigs. Unfortunately DAERA could not provide data on poultry. The imports are categorised into further production and breed (FP & B) and direct slaughter (DS).

Category	2015 Cattle Imports	2016 Cattle Imports	2017 Cattle Imports	3 Year Average
FP & B	31,549	16,416	19,119	22,361
DS	29,939	13,488	17,789	20,405
<b>Total</b>	<b>61,488</b>	<b>29,904</b>	<b>36,908</b>	<b>42,767</b>

Category	2015 Sheep Imports	2016 Sheep Imports	2017 Sheep Imports	3 Year Average
FP & B	5,675	7,792	10,748	8,072
DS	901	2,943	2,797	2,214
<b>Total</b>	<b>6,576</b>	<b>10,735</b>	<b>13,545</b>	<b>10,285</b>

Category	2015 Pigs Imports	2016 Pigs Imports	2017 Pigs Imports	3 Year Average
DS	510,473	421,823	449,830	460,709

***Q1k) Are you based in Northern Ireland***

Yes, as per our answers to the previous questions we are based in Northern Ireland. Our response to previous questions explains the extent of our trade with the Republic of Ireland and clarifies that they are transported for slaughter, further production and breeding. In the vast majority of cases journey's within the island of Ireland will at the very most be 8 hours.

As per our previous answers, live export to Great Britain is also a very important route to market for farmers in Northern Ireland to avail of better prices. These animals will be transported for slaughter, production or breeding. In the vast majority of cases the journey will last no more than 8 hours (however, the UK may grant a derogation to permit transport by road for up to 12 hours to take into account the remoteness of some regions). The 3-year average annual live exports to Great Britain for cattle and sheep are documented below. It is not possible to distinguish between animals for further production and breeding. There is also strong trade for sows from Northern Ireland to Great Britain for slaughter, however DAERA was unable to provide this data for us.

**2015 – 2017 Average Annual Live Exports from Northern Ireland to Great Britain**

FP & B Cattle Exports to GB	10740
DS Cattle Exports to GB	5567
<b>GB only</b>	<b>5567</b>
FP & B Sheep exports to GB	70525
DS Sheep exports to GB	436
<b>GB only</b>	<b>436</b>

***Q2a) What are the key current regulatory requirements that you think protect the welfare needs of animals during transport?***

In Northern Ireland the Welfare of Animals (Transport) Regulations (Northern Ireland) 2006 implemented the Council Regulation (EB) No1/2005. We believe these regulations provide stringent and accountable regulation for the welfare of animals during transport.

***Q2b) What issues or deficiencies in the current regulations are you aware of?***

We do not believe there are any issues or deficiencies in the current regulations. It is important that animal welfare regulation is supported by sound science and not perception or assumption. The European regulations are supported by the latest scientific opinion from the European Food Safety Authority (EFSA). The last scientific opinion published by EFSA in 2011 made a number of minor recommendations but it did not fundamentally lead to a change in regulations.

The Ulster Farmers Union has obtained the UK animal transport inspection reports for 2015 and 2016 which are submitted to the European Commission from DAERA. In total across 2015 and 2016 approximately 3 million cattle, 18 million pigs and 27 million sheep were inspected in the UK in accordance with the animal welfare transport regulations. Both of

these inspection reports identify that the UK has exceptionally high compliance levels with the regulations. On average across both 2015 and 2016 non-compliances vs the total number of inspections for cattle was just 0.06% of total inspections; pigs was 0.03%; and sheep was 0.007%. As regards enforcement actions taken vs the number of inspections completed during these periods on average in cattle this represented 0.013%; in pigs 0.003% and with sheep 0.001%. While this data does not delve into the difference between internal and external movements from the UK, it does show that the regulations are strictly complied with.

The Ulster Farmers Union has had a number of conversations with DAERA who have confirmed that where the welfare of animals transport regulations have been complied with then they are very content with the welfare of the animals. Similarly the Ulster Farmers' Union has also sought advice from the Teagasc research institute in the Republic of Ireland who have confirmed the views of DAERA.

***Q2c) What do you consider are the most important considerations for improving animal welfare during the transport of animals or related operations?***

We support regulation which is based on sound science. The existing welfare regulations for the transport of animals are supported by science and at this stage we do not believe there is evidence to merit 'improving' the existing regulations.

***Q2d) The current EU regulations requires transporters to reach a higher standard if they are transporting animals on long journeys i.e. more than 8 hours. How do you think we should define long journeys?***

We are content that the existing definition of long journeys as per the European requirements is maintained.

***Q2e) What evidence do you have that journey length influences the welfare conditions for animals?***

The European Food Safety Authority scientific opinion from 2011 outlines that the length of journey can have an impact on animal welfare, however we are satisfied that the existing European regulations ensure that a high level of animal welfare is adhered to by insisting that rest and feeding periods are implemented on journeys over 8 hours.

***Q2f) On long journeys, the regulation currently requires rest stops to allow the animals to recover before continuing their journey. There is no limit on the number of rest stops required nor a maximum journey length. I) Do you believe there should be a maximum number of rest stops? II) Do you believe that there should be a maximum journey limit?***

No do we not believe there should be a maximum number of rest stops or a maximum journey limit. The current protocols which are followed for rest and feed stops are sufficient in terms of generating a high animal welfare outcome. For journeys outside of the UK checks are completed by the competent authorities in neighbouring EU Member States which ensure that compliance with the regulations is sustained from the departure point until the arrival point.

***Q2g) What evidence do you have on how the different forms of transport affect animal welfare?***

The scientific opinion published by the European Food Safety Authority provides the evidence base for the existing European animals in transport regulations. We believe this is the most up to date evidence base for considering animal welfare during transport.

***Q2h) Do you have any evidence on the transport of unweaned animals? What age related conditions do you think should apply?***

We do not believe any new age related conditions are required over and above what is currently implemented by the competent authorities. We understand that the Scottish Government is currently conducting a research project assessing the welfare of young dairy calves on their journey from Scotland to Spain for further production. We will be keen to understand the findings from this research when it becomes available.

***Q2i) What conditions do you think should apply to animals post transport?***

After transport journeys it is important that farmed animals are provided with a high standard of welfare. We believe the existing European regulations on animal welfare ensure that farmers in the UK comply with some of the highest standards in the world.

***Q2j) How do you think fitness to travel should be defined?***

The existing guidance from DAERA identifies that *“the animal must be fit for the intended journey before the journey starts and must remain sufficiently fit throughout the journey.”* We believe this existing definition and the guidance provided by DAERA ensures that a high standard of animal welfare is delivered.

***Q3a) Does the journey end point i.e. slaughterhouse or production facility influence animal welfare?***

No we do not believe the end journey point influences animal welfare. Compliance with animal welfare regulations is strictly inspected by DAERA in Northern Ireland no matter which journey point is intended.

***Q3b) Do you think that a ban on live animal exports, or imports, should apply?***

No, we would robustly argue that there must be no ban on live exports from the United Kingdom. We have recently written to the DEFRA Minister and the Secretary of State for Northern Ireland to outline the following:

*Statistics obtained by the Ulster Farmers' Union (UFU) from the Department for Agriculture, Environment and Rural Affairs (DAERA) and the Livestock & Meat Commission (LMC) show that on average over the past 3 years approximately 50,000 cattle and 500,000 sheep are exported live from Northern Ireland annually. These numbers reflect livestock going for both slaughter and further production in export destinations mainly in Great Britain, the Republic of Ireland and Spain, although there are a number of other continental destinations as well. Perhaps the main point to take away from these statistics is that 85% of our sheep live exports are to EU Member States (primarily RoI) and almost 70% of cattle live exports are to EU Member States (primarily Spain and RoI). Bringing this into context alongside Brexit, this highlights the significance of our live export trade and the necessity to*

*maintain un-interrupted free trade with EU Member States once the UK leaves the European Union.*

*For farmers be argue that this trade is financially significant. This financial benefit derived from this trade all percolates into the rural towns and villages which are so reliant on the Northern Ireland farming industry to stimulate economic activity.*

*It is not just the value of this trade which is important but also the competition that it generates in the sector for livestock. The livestock processing sector in Northern Ireland is well consolidated in the hands of a small number of companies and it is therefore essential that we have direct competition for livestock from businesses based outside of Northern Ireland. We cannot stress enough how crucial this competition is to maintain the viability of local beef and sheep farms. Without this competition we will not have a functional supply chain and any hope of improving the supply chain through a future UK agriculture policy will be made hugely difficult.*

*Much of the rationale put forward by campaigners wishing to see an end to live exports is because of their assumption that the trade has an adverse impact on animal welfare. This is despite the fact that all of the European animal transport legislation that the farming industry adheres too is supported by science which has been reviewed by the European Food Safety Authority (EFSA). The findings by EFSA we feel also link in well with the discussions the UFU has had with DAERA veterinary officials who have confirmed that they are very happy with the welfare of farm animals which are exported live as long as the animals are transported in accordance with the law. These are high standards which we feel need to be maintained but we do not think there is scientific evidence to show additional regulatory controls are needed.*

*Securing fair and proportionate legislation for the live export of animals will be important in the future but so too will the UK government's determination to ensure that countries which seek to market red meat products in the UK post Brexit comply with our standards. We need a cast iron guarantee from the UK government that this will happen. There is no point in UK farmers complying with world class animal welfare standards if the UK's trading partners do not comply with equivalent animal welfare standards. Failure to secure equivalent standards from the UK's trading partners will do nothing else but undermine UK agricultural production and jeopardise our food security. We do not think this is in the interests of the general public or the UK agri-food industry.*

*We are keen that Northern Ireland is seen as a region which excels in delivering high animal welfare standards and that policy is driven by sound science. As it stands, we believe the evidence is clear. As long as the existing legal requirements are met and there are safeguards to ensure that the competent authorities monitor compliance levels, there is absolutely no rationale to add additional controls or even consider banning the live export of farmed animals. We want to see our cattle and sheep sector have a sustainable and competitive future. That is one that is profitable, environmentally friendly and which supports our important rural communities. To achieve this, free trade with our European neighbours must be maintained post Brexit and additional controls prohibiting the live export of farmed animals must not be introduced.*

***Q3c) Currently, under the Regulation, livestock vessels and lorries require pre-approval inspections, whereas as roll-on, roll-off vessels or aircraft do not? Do you think that all transporters should be inspected and approved?***

We believe the existing European regulations for animal welfare and transport are sufficient. DAERA currently also completes inspections of livestock transporting vehicles which travel on roll on, roll – off vessels between Northern Ireland and Scotland.

***Q3d) What other factors should be considered and addressed to improve the welfare of animals during transport?***

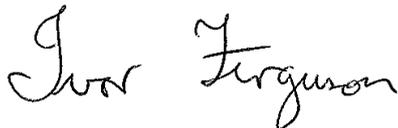
We believe that science supports the existing European animal welfare during transport regulations. We do not believe additional requirements should be considered unless there is sound science which helps supports a need to improve.

***Q3e) Do you have any other proposed UK Government policy reforms?***

The Ulster Farmers Union believes that DEFRA should bring forward a discussion paper on whether non-stun slaughter should be permitted in the United Kingdom. The Ulster Farmers' Union currently does not have a position on non-stun slaughter however in light of the drive to see the United Kingdom recognised as a country with the highest animal welfare standards in the world it is important that this issue is properly analysed. We believe that DEFRA should play key a role in presenting the evidence base to industry and the general public to help inform discussion and decision making on this matter.

I trust that these comments are of use and will be fully considered in this consultation process.

Yours sincerely,

A handwritten signature in black ink that reads "Ivor Ferguson". The signature is written in a cursive, slightly slanted style.

Ivor Ferguson