



31 July 2006

Welfare in Transport Implementation Team
Animal Welfare Division
Defra
1a Page Street
London SW1P 4PQ

Dear Sirs

**THE WELFARE OF ANIMALS DURING TRANSPORT
CONSULTATION ON THE IMPLEMENTATION OF EU REGULATION 1/2005**

The Rare Breeds Survival Trust (RBST) was created in 1973 to support endangered native breeds of livestock in the United Kingdom (UK). During the twentieth century before 1973 more than twenty breeds of large livestock became extinct, but none have been lost since that time. Their status is recognised in the CBD (1992) to which the UK is a signatory, and in Defra's UK Country Report on FAnGR 2002. However, they remain under threat not only from disease epidemics and breed substitution, but also from national measures to control disease and from increasing bureaucracy.

The implementation of EU Regulation 1/2005 increases the threat to rare and minority native breeds, and we are concerned that the proposals for the implementation of Regulation 1/2005 will have a damaging effect on FAnGR in the UK. Completion of extra forms and licences will add to an already onerous paper trail. Many owners of rare breeds will find the requirements an unacceptable extra burden, and are likely to cease keeping their animals.

The Regulation requires that new conditions will apply from 5 January 2007 to the transportation of any vertebrate animal on a journey of more than 65 km in connection with an economic activity. How is 'economic activity' defined? Rare breeds participate in many activities such as displays, demonstrations, shows, etc. which are not an economic activity. Can we assume that the proposals do not apply to these activities?

The distance limit of 65 km is not realistic. For events organised by, or on behalf of, the RBST the majority of animals would travel much more than this distance and a more reasonable distance would be 450 km. Small breeders frequently need to transport livestock over the minimum distance prescribed, for the efficient exchange of bloodlines in genetic conservation.

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We note that self-declaration is proposed with regard to the authorisation for the conditions applying to transportation, and this would help to reduce the imposition on owners of rare breeds. However, the additional conditions for long distance authorisation (i.e. > 65 km and > 8 hours) would be especially inhibiting. Certification for vehicle approval, possession of a Global Positioning System, certificate of competence, and possible charges by Defra would render transport of livestock beyond the resources of many owners of rare breeds.

The approval of vehicles (Section 4) gives opportunity to impose further charges on owners, and we consider that the inspection and approval of vehicles by "any body that can demonstrate its capability and competence" is not a satisfactory basis for a proper and effective procedure.

We note the derogations suggested (Section 5) and agree that derogations should be applied where the cost/detriment to owners of rare breeds will be disproportionate to the number and type of journeys undertaken and to the possible welfare benefits. Both these factors apply in the case of rare breeds.

The vehicle requirements (e.g. navigation system, roof specifications, temperature control, etc) are not appropriate for British conditions.

We also recommend most strongly that the time limit should be raised to 12 hours and the distance should be increased as suggested above.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Terry', is written over a light blue horizontal line.

Robert Terry
Executive Director