



## Consultation on improvements to animal welfare in transport.

We note that your consultation is ostensibly focusing upon “*the proposal to end the export of livestock and horses (this will not apply to poultry) from England and Wales for slaughter and fattening*” Yet, “*This consultation also seeks views on proposals to reduce maximum journey times for all journeys in England and Wales, and to improve the conditions of animal transport more generally*” and “*the government wants to gather views on potential exceptions to the other proposed changes to the regulations, provided there are sufficient welfare protections in place.*”

Our comments do not fit neatly into the categories and questions in the online survey, hence we are emailing considerations that you may find helpful in answering the questions you have posed.

Understanding Animal Research is a not-for-profit member organisation that represents organisations involved in funding and undertaking research including universities, learned societies, industry, unions and institutions or charities dedicated to medical and veterinary research.

### Response

Understanding Animal Research is supportive of attempts to improve animal welfare conditions in transport and elsewhere, but measures should be taken to exempt animals used in scientific research from this particular piece of legislation in order to avoid the potentially serious unintended consequences of impeding scientific investigations or failing to cater for the potentially divergent welfare animal needs of research animals.

To this end, there must be a specific exemption for **animals involved in or intended for scientific research**. It is not enough to make designations based upon animals being transported for commercial reasons because laboratories are supplied with animals from specialist breeders, which are themselves subject to control and approval by the Home Office Animals in Science Regulation Unit (ASRU).

Nor is it enough to make designations based on species alone since farm animal species make up a significant number of the c50,000 experiments undertaken annually to investigate animal diseases. In addition, animals like horses can be used in research, such as in the production of antibodies that are key to a broad range of diagnostic and therapeutic applications including treatments for Covid-19.

We therefore suggest this exemption is worded as bolded above and included on the face of the legislation.

Every aspect of animal use in science is heavily regulated through mature systems, some aspects of which are more than a century old, which are yet regularly updated in line with the latest science regarding animal welfare. There are, often detailed, systems in place governing ethics, transport, breeding and every other step of the process of getting an animal to a lab and using it in an experiment. Indeed, in many cases the animal itself is the experiment, such as when it has been genetically manipulated.



Animal welfare rightly remains the focus of lab animal regulation. However, the context in which such animals are used can fall outside of normal welfare considerations. For instance, the animal may be suffering from a novel disease and must be transported to a lab for investigation. The animal's welfare needs may diverge from the norm, or the moral and ethical case for transporting the animal in a certain way may ethically take precedence over blanket rules on welfare.

Lab animal breeders seek to provide healthy, well habituated animals as part of their commercial offer. There is therefore minimal risk in including a specific and blanket exemption of animals involved in or intended for scientific research.

The circumstances in which any deviation from this may occur, such as in the case of a disease pandemic, are covered amply by other regulations which contain the necessary controls to address every aspect of the animals' legitimate use, journey and experience even when these must occur in unusual circumstances.

Placing this exemption squarely in the forefront of proposed legislation would serve to ensure that inexact wording elsewhere is not misinterpreted with any consequent unintended detriment to human or animal welfare.

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