

Royal Society of Biology response to the Scottish Government consultation on the recommendations by the Farm Animal Welfare Committee on the welfare of animals during transport

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The Royal Society of Biology (RSB) is a single unified voice, representing a diverse membership of individuals, learned societies and other organisations. The RSB Scotland Education and Policy Network provides evidence based insight and views specifically on devolved areas of policy. Collectively we are committed to ensuring that we provide Government and other policymakers, including funders of biological education and research, with a distinct point of access to authoritative, independent, and evidence-based opinion, representative of the widest range of bioscience disciplines.

The Royal Society of Biology welcomes this consultation and is pleased to provide summary comments informed by our membership of individuals and organisations with expert interests across the biosciences (please see the Appendix for a list of our member organisations). Much of this expertise is represented in the [Animal Science Group](#)¹, a special interest group of the Royal Society of Biology.

Animal research remains necessary, where no alternatives are available, to support improved scientific and medical knowledge and health and welfare outcomes for people and animals^{2,3,4,5,6}. The bioscience research sector is a major contributor to Scotland's economy with £2.4 billion gross⁷ value added to the economy. It is therefore important that Scotland's policies and legislation continue

¹ For further information about the Animal Science Group, a special interest group of the Royal Society of Biology, see:

<https://www.rsb.org.uk/policy/groups-and-committees/asg>

² For the fundamental contribution of animal research to biomedical and veterinary progress and an overview of how these studies are highly regulated in the UK please see <https://www.rsb.org.uk/policy/policy-issues/biomedical-sciences/animal-research>

³ UK Research and Innovation: The use of animals in research. <https://www.ukri.org/about-us/policies-standards-and-data/good-research-resource-hub/use-of-animals-in-research/>

⁴ The Wellcome Trust: Research involving animals. <https://wellcome.org/what-we-do/our-work/our-policy-work/animal-research>

⁵ The Association of the British Pharmaceutical Industry: Research using animals. <https://www.abpi.org.uk/medicine-discovery/new-medicines-data/research-using-animals/#ab19d050>

⁶ The Concordat on openness on animal research in the UK. <http://concordatopenness.org.uk/>

⁷ Scottish Development International: the life sciences and biotech sector. <https://www.sdi.co.uk/key-sectors/life-sciences-and-biotech>

to provide an enabling environment for the life science sector to thrive; an environment where excellent science and high standards of animal welfare go hand in hand.

1. Summary

We welcome the Government's desire to reflect the latest scientific and veterinary knowledge in regulatory regimes governing animal transport; we also welcome its focus on welfare. "Our response to this consultation does not attempt to address the consultation's noted purposes relating to exports of farm animals for slaughter, but rather addresses the broader question about improvements to the welfare of animals during transport, which also incorporates the transportation of animals for bioscience research"⁸. We focus this evidence submission on specifically highlighting the fact that EU Council Regulation No 1/2005⁹, and related Scottish legislation¹⁰, also applies to regulated species when they are transported for scientific use (predominantly breeding and research), rather than for slaughter. The Farm Animal Welfare Council (FAWC) acknowledges that not all of the species have been covered in their opinion paper and recommend that other species should be considered in a follow-up opinion on the transport of animals that are not covered i.e. fish, cats and other animals¹¹. FAWC also states that: "whilst this list is not exclusive, those involved in transporting as part of an economic activity include; farmers, livestock hauliers, those who move domestic equines in connection with professional riding, livery and stabling, those involved in commercial pet breeding or racing (e.g. dog racing), those moving animals used in films, zoos, leisure parks charities, **research facilities**, pet couriers, breed societies (conservation breeders) and equine hauliers".

In light of these points, our position is as follows. All text in points 1.1 – 1.7 which are housed within quotation marks are derived from The Royal Society of Biology (2018) response to the Defra call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU¹².

1.1. "Any review of the regulations governing live animal transport must take due care to avoid unintended consequences for the regulated transport of live animals for the purposes of scientific use, which constitutes a separate and distinct purpose from the transport of live

⁸ The Royal Society of Biology (2018). Response to the Defra call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU. URL: https://www.rsb.org.uk/images/article/policy/RSB_response_to_the_Defra_call_for_evidence_on_controlling_live_exports_for_slaugther_for_submission.pdf

⁹ EU "Council Regulation No 1/2005 on the protection of animals during transport and related operations" is the main legislation governing the transport of animals, it states that: "No person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them"; URL: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32005R0001&from=EN>

¹⁰ The Welfare of Animals (Transport) (Scotland) Regulations 2006
<https://www.legislation.gov.uk/ssi/2006/606/contents/made>

¹¹ The Farm Animal Welfare Committee (2019). Opinion on the welfare of animals during transport.
https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/improvements-to-animal-welfare-in-transport/supporting_documents/fawcopiniononthewelfareofanimalsduringtransport.pdf

¹² Op. cit. (see footnote 8)

animals destined for slaughter. Animal health and welfare remains a key and important consideration when transporting animals for scientific use, and is currently regulated as such. We suggest that any legislative development should clearly delineate focus and scope”.

- 1.2. “The regulated use of laboratory animals in research remains necessary, where no alternatives are available, to support improved scientific and medical knowledge and health and welfare outcomes for people and animals. National and international legislation and regulations on the use of animals in scientific procedures incorporate a set of principles, called the 3Rs for Replacement, Reduction and Refinement, which provide a framework for performing humane animal research and endorsing appropriate methods of experimentation on animals¹³; these should be taken into consideration when implementing current best practice for transportation of animals for research purposes”.
- 1.3. “A collaborative approach to scientific research is key for the UK to maintain excellence and a leading role in the global science and innovation community. These collaborations often require the sharing of resources, including for example certain animal strains. Undue restrictions on the movement of laboratory animals could therefore disrupt ongoing and upcoming collaborative international projects” - thereby impacting the Scotland’s biosciences sector and medical progress, and animal health and welfare.
- 1.4. “There is general consensus that the transport of cryopreserved germplasm (frozen embryos and gametes) for use in research is preferable to the transport of live animals, however, transport of germplasm is very difficult in some cases and for some species and lineages; thus, the transport of live animals is currently necessary in these cases”.
- 1.5. “A number of species, such as sheep, which are also bred for farming purposes, are currently used in biomedical research” in Scotland, for example at the Roslin Institute, which is a world leading research centre whose aim is ‘to enhance the lives of animals and humans through world class research in animal biology.’ Unlike in farming, livestock species used for research purposes are normally sourced from specialist providers, can sometimes be genetically altered (GA), and are transported at very high welfare standards when they need to be moved from one research institution to another (sometimes internationally)¹⁴.
- 1.6. “The RSB supports the approach to achieve current best practice and standards of animal health and welfare at all points in animal care and husbandry, including in transport between this and other nations. We consider that good welfare and good science go hand in hand, and both are key to the public benefit and in response to need”.
- 1.7. “We recommend that high standard transport (import and export) of animals necessary for scientific use (predominantly breeding and research) should be separately considered, as part of any regulatory development, to ensure it continues”.

¹³ ‘What are the 3Rs?’ on the National Centre for Replacement, Refinement & Reduction of animals in research; URL: <https://www.nc3rs.org.uk/the-3rs>

¹⁴ Please see the case study of the GA sheep model for human Huntington’s disease described in paragraph 3.2 of the 2018 RSB response to the DEFA call for evidence on controlling live animal exports (Op. cit. in footnote 8).

Further advice on the subject of animal welfare is provided by our response to the Defra consultation on the draft Animal Welfare (Sentencing and Recognition of Sentience) Bill¹⁵ and our response to the Defra call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU, which this present submission to the Scottish Government is based on.

2. Information on the current system of transport of live animals necessary for laboratory research and scientific study

All text in points 2.1 – 2.4 which are housed within quotation marks are derived from The Royal Society of Biology (2018) response to the Defra call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU¹⁶.

- 2.1. “The transportation of animals for laboratory research or other authorised scientific studies occurs in a variety of settings and circumstances relating to species, modes of transport, origin and destination, and the purpose/ reasons for their movement”.
- 2.2. We are pleased to see that FAWC included the 3Rs in the list of welfare principles to be applied to the transport of animals¹⁷. “The principles of the 3Rs are embedded into the framework used by the governmental regulator, the Animals in Science Regulation Unit (ASRU), to grant licenses for experiments with animals under the relevant Act, the Animals (Scientific Procedure) Act (ASPA)¹⁸. The justification for transporting live animals for research should be considered in light of these important principles. A decision to transport live individuals of certain species, relative to embryos and/or germplasm, should be reached as the result of a balanced assessment of the total number of animals and severity of procedures involved in the research project for which the animals are transported. Such assessment enables the identification of many instances in which the transport of live animals results in fewer animals used for a scientific project, with less harm caused to them, making live animal transport the higher welfare approach, overall, in these circumstances”.
- 2.3. “The vast majority of animals used for research in the UK are bred in the UK. However, many research programmes are based on international collaboration across borders. In certain cases, the animals’ breeding and rearing may rely on specific techniques only available at a research institution overseas, with subsequent transport to the UK where the necessary research facilities and expertise are”.
- 2.4. “The Laboratory Animal Breeders Association of Great Britain (LABA) and the Laboratory Animal Science Association (LASA) have published guidelines for the care of laboratory

¹⁵ The Royal Society of Biology (2018). Response to the Defra consultation on the draft Animal Welfare (Sentencing and Recognition of Sentience) Bill; URL:

https://www.rsb.org.uk/images/RSB_response_Defra_draft_Animal_Welfare_Sentencing_and_Recognition_of_Sentience_Bill.pdf

¹⁶ Op. cit. (see footnote 8)

¹⁷ FAWC opinion (page 53). Op. cit. (see footnote 11)

¹⁸ About government’s commitment to the principle of the 3Rs please see <https://www.gov.uk/guidance/research-and-testing-using-animals#replacement-reduction-and-refinement>

animals in transit¹⁹, which supplements that of the International Air Transport Association (IATA)²⁰.

3. Possible future reform

- 3.1. All transport of animals, whatever the species and the journey end-point, should be conducted to high standards of animal welfare. Animal research is vitally important to improve the health, wellbeing and welfare of people and animals in Scotland and internationally; the ability to transport animals remains essential until viable alternatives are found. There are already strict rules in place to ensure research animal care standards, enabling safe and humane transportation when necessary.
- 3.2. When considering updates and changes to legislation, the modes of transport with the least impact on animal welfare should be encouraged – following current best practice in animal husbandry – in accordance with national and international legislation. In addition to this, we would recommend that the Scottish Government operate a transport authorisation and monitoring system that achieves the right level of biosecurity and animal welfare, without hampering scientific collaboration, and that works effectively and efficiently in doing so. We recommend that the Government ensure early and ongoing consultation with all relevant stakeholders and expertise groups throughout any regulatory revision process. Ongoing consultation should include academic and industry based researchers and institutions, and breeders and suppliers of animals for research, among others.

The Society welcomes the Scottish Government's consultation on the recommendations made by the Farm Animal Welfare Committee in their opinion on the welfare of animals during transport. We are pleased to offer these comments, which have been informed by specific input from our members and Member Organisations across the biological disciplines (Appendix).

For any queries, please contact the Science Policy Team at The Royal Society of Biology, 1 Naoroji Street, London WC1X 0GB - Tel: +44 (0)20 3925 3440 - www.rsb.org.uk - consultation@rsb.org.uk

Appendix: Member Organisations of the Royal Society of Biology (following page)

¹⁹ LABA and LASA, (1993). Laboratory Animal Breeders Association of Great Britain and Laboratory Animal Science Association. Guidelines for the care of laboratory animals in transit. *Laboratory Animals*, 27: 93-107

²⁰ IATA, (2002). International Air Transport Association. Live Animal Regulations Montreal.

Full Organisational Members

Agriculture and Horticulture Development Board
 Anatomical Society
 Association for the Study of Animal Behaviour
 Association of Applied Biologists
 Association of Reproductive and Clinical Scientists (ARCS)
 Bat Conservation Trust
 Biochemical Society
 British Association for Lung Research
 British Association for Psychopharmacology
 British Biophysical Society
 British Ecological Society
 British Lichen Society
 British Microcirculation and Vascular Biology Society
 British Mycological Society
 British Neuroscience Association
 British Pharmacological Society
 British Phycological Society
 British Society for Cell Biology
 British Society for Developmental Biology
 British Society for Gene and Cell Therapy
 British Society for Immunology
 British Society for Matrix Biology
 British Society for Neuroendocrinology
 British Society for Parasitology
 British Society of Plant Breeders
 British Society for Plant Pathology
 British Society for Proteome Research
 British Society for Research on Ageing
 British Society of Animal Science
 British Society of Soil Science
 British Society of Toxicological Pathology
 British Toxicology Society
 Daphne Jackson Trust
 The Field Studies Council
 Fisheries Society of the British Isles
 Fondazione Guido Bernardini
 GARNet
 Gatsby Plant Science Education Programme (incl. Science and Plants for Schools)
 Genetics Society
 Heads of University Centres of Biomedical Science
 Institute of Animal Technology
 Laboratory Animal Science Association
 Linnean Society of London
 Microbiology Society
 MONOGRAM – Cereal and Grasses Research Community
 Network of Researchers on the Chemical Evolution of Life

Nutrition Society
 Quekett Microscopical Club
 The Rosaceae Network
 Society for Applied Microbiology
 Society for Experimental Biology
 Society for Reproduction and Fertility
 Society for the Study of Human Biology
 South London Botanical Institute
 The Physiological Society
 Tropical Agriculture Association
 UK Brassica Research Community
 UK Environmental Mutagen Society
 University Bioscience Managers' Association
 Zoological Society of London

Supporting Organisational Members

Animal & Plant Health Agency (APHA)
 Association of the British Pharmaceutical Industry (ABPI)
 AstraZeneca
 BioIndustry Association
 Biotechnology and Biological Sciences Research Council (BBSRC)
 British Science Association
 Covance
 Ethical Medicines Industry Group
 Fera
 Institute of Physics
 Ipsen
 Medical Research Council (MRC)
 NNedPro Global Centre for Nutrition and Health
 Northern Ireland Water
 Porton Biopharma
 Royal Society for Public Health
 Severn Trent Water
 Syngenta
 Understanding Animal Research
 Unilever UK Ltd
 United Kingdom Science Park Association
 Wellcome Trust
 Wessex Water
 Wiley Blackwell