



## Response to the Consultation on the Farm Animal Welfare Committee – opinion on the welfare of animals during transport

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The Ornamental Aquatic Trade Association (OATA) represents more than 850 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or garden pond. Our members include retailers, breeders, importers and manufacturers, many of which are SMEs. We have 47 members in Scotland, mostly retailers.

We promote high welfare standards in the industry through a wide variety of initiatives, such as our Code of Conduct, [Transport Code](#), customer care sheets and our partnerships under the Government's Primary Authority Scheme. (We were pleased to see that our Transport Code was referenced in the original FAWC report under Fitness for Transport as a specialized guide for our industry).

The majority of the species in which our members' trade are not native to the UK and there is little domestic commercial breeding, particularly of tropical freshwater and marine fish. Most of the fish for the home aquarium industry are imported into the country, largely by air. The main airport destination is London Heathrow although most fish destined for Scotland will come into Manchester airport. (Some will come from Europe by van but these usually come into Dover or via Eurotunnel). Fish consignments are then transported around the UK by road. Consequently, the vast majority of fish are packaged according to the International Air Transport Association's (IATA) standards that require fish to be packed to survive for 48 hours from their time of acceptance by an airline. It is important to understand that fish remain in this packaging until they arrive at their UK destination (e.g. wholesaler or retailer) where they are unpacked by knowledgeable staff in the right conditions of lighting etc. **This is a key difference from any other kind of animal transport.** It is also important to note that any exports of fish would require these same packaging requirements before they are exported from the UK.

Our industry is reliant on the provision of live, healthy animals so it is a priority, and indeed financially prudent, for our members to keep the fish they trade in healthy and as stress-free as possible at every stage of their journey.

While we note that this consultation document is primarily looking at the transport of farm animals, we note that companion animal transport is mentioned within the document, which would include ornamental fish. We note also the original opinion from FAWC included specific mention of all

animal transportation, including fish, reptiles and amphibians. Any consultation on the transport of live animals is of paramount interest to us because it is an integral part of our industry. We want to ensure that any such consultation does not inadvertently compromise the welfare of ornamental fish in transport through unintended consequences and to demonstrate that the transport of live fish is already well governed and executed.

We previously responded to Defra's 2018 consultation on which the Farm Animal Welfare Committee has based its recommendations. [You can read it here](#). If you are interested in the ornamental fish trade in Scotland [this paper we prepared for the Scottish Animal Welfare Committee](#) might be of interest.

We will therefore concentrate on specific questions which we believe could unintentionally raise issues for the transport of live ornamental fish for the pet trade.

#### **Question 1 Call for more research**

We would always support more independent research into this issue. Our sector has already undertaken work to investigate issues which may affect welfare in transport to inform the way ornamental fish are transported in the future. See for example:

<https://www.sciencedirect.com/science/article/abs/pii/S0044848620313624>.

#### **Question 8 Transport practices**

We support the position of the Scottish Government to 'consider how to apply a risk based and proportionate approach in relation to authorisations, Certificates of Competence and other aspects of statutory regulation'.

We note that the FAWC wants to remove the definition of a commercial journey so that all animals come under the regulation. While we agree that animal welfare is of paramount importance it is likely to be unrealistic and unenforceable to expect all journeys transporting companion animals to be covered by transport regulations. To require inspection of vehicles or the need to obtain Certificates of Competence for people moving their pets around places creates potentially unnecessary and expensive barriers to pet ownership which has been recognised of significant importance for people's wellbeing, particularly during the current pandemic.

For our sector, it would cover some of the local journeys now being undertaken by shops with their new home delivery services set up in response to the Covid-19 pandemic, customers taking fish from a shop to their home, or fish-keepers taking fish to hobby shows for example. According to pet shop/animal activity licensing, shops that sell live animals are required to give out care information with every animal sale and aquatics stores in particular pack fish in a way that protects them for their homeward journey. To us, it would be much better use of resources to enforce the current Welfare of Animals in Transport Order (WATO) regulations effectively. There currently seems to be little enforcement of these regulations, in particular around the use of unlicensed carriers. We know, for example, that fish are sent through the Royal Mail post, even though this is against the Royal Mail's own policy and Royal Mail does not have a valid transport authorisation to enable them to transport live animals. We believe this would have a much greater impact on safeguarding animal welfare in transport than potentially burdensome, expensive and difficult to enforce controls.

#### **Q9 Thermal conditions and ventilation**

We note that this recommendation includes provisions for companion animals – which would include fish. The requirements for live fish in transport are very different from air-breathing and warm-blooded vertebrates, such as farm animals or other companion animals and there is not the need for transport vehicles to have special provisions that might be required for air-breathing

animals. Fish are packed with a certain ratio of water and oxygen in bags, these bags are packed into polystyrene boxes to regulate temperature and then into cardboard boxes on which are fixed all the right labelling notifications. Packaging minimises movement and disturbance (and therefore stress) whilst in transport. It is vital these boxes are not opened at any stage in the journey by untrained personnel. This form of packaging is well tested and known to minimise stress in transport. We would not support measures which would compromise these well-established packing standards.

As we described above, when fish enter the country by air they have been packed to IATA standards (which require fish to be able to survive in their packing for 48 hours). So there is no need for ventilation, temperature monitoring and warning systems in either their packaging or in the vehicles used to transport them within the UK. To bring in these types of requirements for all companion animals would be a superfluous requirement imposing costs on aquatic businesses with no welfare benefit for the fish in transport. We believe full enforcement of current regulations would deliver high welfare standards for ornamental fish and would suggest that a specific exemption for ornamental fish is included in any change to current requirements.

### **Question 9 Long journeys & Question 10 Journey times/rest periods**

We note that FAWC is recommending that if any journey goes beyond 21 hours for all animals (cattle, sheep, and other livestock and companion animals that are not mentioned in Table 7) then written consent is required and submitted to APHA for review. We would not support this change for ornamental fish.

Fish have different requirements than air-breathing animals. Provided they are packed correctly and not interfered with they can survive for well over the 21 hours suggested. As we have pointed out elsewhere, IATA requires fish to be packed so that they will survive at least 48 hours from their time of acceptance by an airline. While it should be noted that most journeys to the UK are less than 24 hours they are likely to exceed 21 hours when the time spent waiting to be checked by APHA vets at Border Control Posts and the onward transport to end destination (wholesaler or retailer) is taken into account, particularly from Manchester airport where many fish are flown into and then driven to Scottish businesses. But if fish are packed properly (according to IATA requirements and best practice) there should not be any concerns about the welfare of these animals during their complete journey. Fish consignments imported into the UK are examined by APHA vets at Border Control Posts through visual checks but they are of course never removed from their bags of water. We would therefore request that fish are exempt from the 21 hour requirement for APHA notification and written consent.

Rest periods on journeys for fish are not needed. In fact it is better to get them to their final destination as quickly as possible so that they can be unpacked by knowledgeable people in the right conditions and then acclimatised before sale. We would urge that specific exemptions are made for ornamental fish in any recommendation.

There are many claims about the mortality rates of fish in transport. These are often ill-founded and poorly evidenced. As described previously, the majority of live ornamental fish come from outside the EU and enter the UK through a BCP where the welfare of the animals is checked by APHA vets. Information from the Heathrow Animal Reception Centre and the Fish Health Inspectorate indicates that mortalities on arrival into the UK are less than 1%. If there were any serious concerns they would be picked up at the point of arrival and action taken accordingly.

This demonstrates that our sector already has good mechanisms in place to ensure animal welfare through the transportation supply chain.

**Additional comments**

We would highlight that there is very little domestic commercial breeding of ornamental fish in the UK because it is commercially unviable for most UK businesses, and for many species not even possible. This is why our members pay so much attention in ensuring the fish they import and trade in are provided with great care throughout the supply chain. Indeed, some of our larger members go as far as to provide training to the fishermen at source or work with NGOs in the field to ensure that fish are caught and packed in a way that minimises adverse welfare impacts, consequently helping to develop local economies in some of the poorest parts of the world where there are few alternative ways to earn a living.

**In summary, we believe that the current controls on the transport of live fish and other animals for the ornamental aquatic trade already provide for high standards of welfare in transport and are fit for purpose. We further believe there is insufficient evidence to justify changing current controls for ornamental fish. Should any further controls be considered we would welcome the opportunity to discuss them further with you to ensure they do not risk compromising the welfare of ornamental fish in transport.**