

Economic Impact of EU Commission Welfare during Transport proposals on the Northern Ireland Pig Sector

In December 2023, the European Commission adopted a “Proposal for a Regulation of the Council & European Parliament on the protection of animals during transport”, promised as part of the Farm to Fork Strategy, announced in May 2020.

The Commission considers that current regulations on welfare of farm animals during transport are fragmented and difficult to enforce. The proposal aims to contribute to animal welfare and sustainability objectives and bring welfare requirements closer to the latest scientific evidence. The proposals are based on information from the **European Food Safety Authority, World Organisation for Animal Health** and the **EU Animal Welfare Platform**. Under the Windsor Framework, Northern Ireland remains aligned with EU single market rules for goods. Therefore, under the rules of the Northern Ireland Protocol, animal welfare legislation applies directly in Northern Ireland. The legislation would also apply to the movement of animals between Northern Ireland and Great Britain (GB) and vice-versa. This briefing outlines the potential economic impacts of the proposal for the Northern Irish pig production sector.

The proposal is wide ranging and has the potential to have significant impacts on the pig production sector in Northern Ireland, worth 297 million to the Northern Irish economy. The key proposals that would have implications for the transport of pigs in Northern Ireland include, but are not limited to:

- Loading and unloading of pigs to be supervised by a veterinarian*
- Increased space allowances during transport*
- Requirement for journey tracking*
- Limitations on journey times
- Maximum and minimum temperatures during which pigs may be transported

*Represents proposals which will have most impact for NI.

These proposals represent a financial impact on the pig sectors of EU member states as well as Northern Ireland. An economic feasibility study of the Commission proposals was co-ordinated by the France based Institute du Porc (IFIP) and COPA-COGECA, an EU wide farming union. 11 countries participated in the study, representing 77.4% of EU pork production. Northern Ireland, through its privileged partnership membership of COPA-COGECA through the British Agriculture Bureau, is an additional country involved in this study. Northern Ireland slaughters approximately 1.84 million finishing pigs at a live slaughter weight of 128 kg. **The IFIP report estimated that the total cost to the NI pig industry would be £3.6 million.** However, this estimate is likely an underestimation as there will be additional costs to implement new systems and adjust to the new regulations. **Figure 1** below provides a breakdown of the major elements of the economic impact for Northern Ireland.

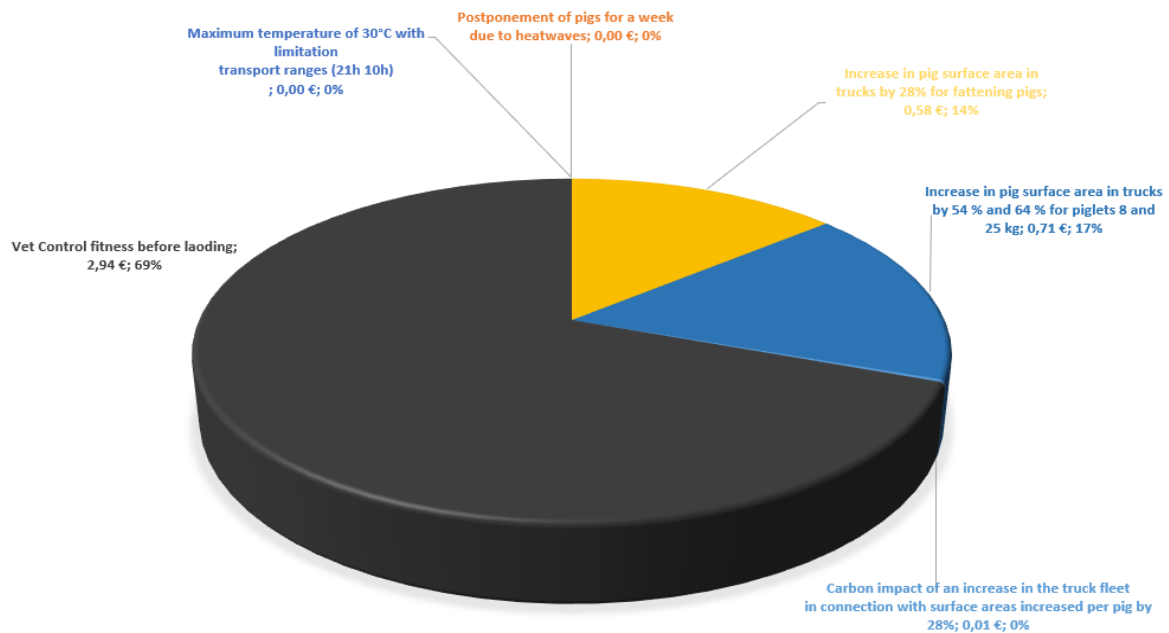


Figure 1; An overview of the breakdown of costs associated with EU proposals for Northern Ireland.

Veterinary Fitness Check

One of the most impactful proposals is the requirement for all loading and unloading of pigs to be supervised by a veterinarian. For pig producers in NI, the average cost of a vet visit is £155 (including VAT). IFIP calculated this requirement alone to represent **69% of the total cost to the NI pig sector (£2.46 million), equating to an increased cost of £2.44 per slaughtered pig.**

Implementing the measures regarding veterinary controls will prove difficult due to lack of veterinary practitioners in rural areas and a lack of interest among veterinarians to carry out this control task. In Northern Ireland, there is an estimated deficit of veterinarians of 10% of the workforce in Northern Ireland.¹ Most loadings of pigs for slaughter occur in the early morning, outside of ordinary working hours, which would compound both of these issues relating to the availability of vets to undertake this task. Moreover, farmers and transporters throughout Northern Ireland prioritise the safe and humane loading and unloading of animals, ensuring their welfare is upheld to the highest standards. This process is effectively managed without veterinary supervision and has consistently operated without any issues.

Increased Space Allowance

The remaining proportion of added costs to the industry as a result of these proposals relates to increased space allowance during transport, **constituting 31% of the costs, equaling £1.11 million, equating to an increased cost of £1.07 per slaughtered pig.**

The impact of the proposed increases for space allowance during transport is two fold. Firstly, an increase of surface area for finishing pigs of approximately 28% as proposed by the Commission will increase the final transport cost. Due to the requirement for each transporting lorry to hold almost a third less pigs, more lorries are going to be needed to transport the same number of pigs. This will also require an increased number of drivers. The IFIP report estimated that this would require investment in 6 new lorries (£318,400 each) and 12 new drivers. Alternatively, the same number of lorries could carry out more frequent journeys. Amending lorries would also incur a cost to industry. In both instances, there will be increased labour costs as well as fuel consumption. This will represent an increased cost to the industry.

Secondly, an increase of surface area by finishing pig of nearly 30 % as proposed by the Commission will increase the risk of injury and mortality. For all stakeholders involved in the IFIP study and from a scientific perspective, with too much surface area, the pig is susceptible to motion sickness and loses balance and falls to the ground when accelerating and braking. At the current regulatory density (235 kg/m², EC 1/2005), the pigs are standing and touching each other to maintain their balance and are able to eat and drink during long journeys with adequate equipment ^{2,3}. The increased space allowance outlined in the Commission's proposal may result in injury to pigs and actually have a negative effect on pig welfare, contrary to the aim of the Commission. The level of mortality during transport is very low in the EU. The average mortality level in EU is now around 2.5/10,000 finished pigs transported in 2023 against 10/10,000 twenty years ago. The efforts in the application of the current density of 235 kg/m² as stipulated in the EC regulation 1/2005 have contributed to reduced mortality. The current level of finishing pig mortality during transport in Northern Ireland is 2/10,000.

Increased space allowance during transport applies also to the transport of piglets. Piglets weighing up to 8kg and those weighing up to 25kg will require increases of 54% and 64% respectively. For Northern Ireland, IFIP estimated this would necessitate 5 new lorries and 10 new drivers. As with the transport of finishing pigs, this represents a significant financial impact through increased transport costs and also brings into question the welfare of piglets during transport.

Journey Tracking

All livestock journeys must receive digital authorisation from the competent authority (DAERA) via TRACES (Trade Control & Export System), as well as recording certificates of approval, competence, journey logs and live tracking of vehicles. Movement authorisation must be sought between 2 and 5 days before departure. Records are to be stored for 6 years. Although no direct cost of this requirement has been estimated, it would represent a high level of administrative burden and cost the industry to invest in new equipment and monitoring systems..

Environmental Impact

The principal environmental impact concern fuel consumption will increase very significantly in connection with the reduction in the number of pigs loaded in a truck by almost 30% for the total 250 million finishing pigs slaughtered per year in Europe. The carbon footprint of the pig food chain will be increased.

This was not quantified in the impact assessment but may be reasonably inferred to have such an effect. At a time when the farming industry across Europe is expected to be reducing their carbon footprint, the implication of these regulations does exactly the opposite.

Social/Economic Impact to consumers

The IFIP report calculated that across the EU, these proposals would stand to reduce overall pig production by 8%. This will lead to an increased price of pork for the consumer and alongside reduced competitiveness, EU pork production may be compromised by cheaper imports from outside Europe in the future. The report predicted

that the impact on the consumer would be an additional cost around 25p/kg for pig fresh meat and around 46p/kg for cooked processed products

Conclusion

In conclusion, the European Commission's proposed amendments to animal welfare legislation during transport would have a substantial economic impact on Northern Ireland's pig sector. This is especially concerning given the sector's prolonged period of crisis in recent years, during which some producers faced losses of up to £15,000 per month. Any further financial burden on the industry would pose a serious challenge to its long term sustainability. It is crucial that the voices of Northern Irish producers are acknowledged and taken into account by officials.

References;

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