



Cymdeithas Frenhinol Atal Creulondeb i Anifeiliaid Royal Society for the Prevention of Cruelty to Animals

January 2010

RSPCA Cymru submission to the National Assembly for Wales Rural Development Sub-Committee Inquiry

Animal welfare at abattoirs and slaughterhouses

1. Introduction

The RSPCA welcomes the opportunity to present its views and observations to the National Assembly for Wales Rural Development Sub-Committee Inquiry into animal welfare and meat hygiene at slaughterhouses. Although there is EU legislation aimed at protecting the welfare of animals at slaughter and killing, the RSPCA is concerned that even the recently revised law due to come into effect in 2013 (Council regulation (EC) No 1099/2009) fails in some respects to safeguard welfare at various stages of the process. Our comments will therefore, not only outline our concerns in relation to poor or inadequate practices in abattoirs, but also areas where legislation and/or its enforcement should be improved. The issues raised are in no way exhaustive, but highlight some of the key areas that we feel should be addressed. In addition, we would like to advise the Committee that we are generally supportive of the many recommendations made by the Farm Animal Welfare Council in its two reports on the Welfare of Farmed Animals at Slaughter or Killing (1)

We hope that the Committee will take our comments into consideration when making its recommendations, and we would be very happy to provide more information or generally offer further help and advice should the Committee feel this to be of benefit to them.

2. General issues

2.1 Surveillance and availability of information: In the past, the Meat Hygiene Service published a report ('MHS Animal welfare review') every two years in which it outlined its findings on a wide range of welfare-related practices and policies (relating to legislation and codes) seen during the course of its work at slaughterhouses across the UK. This served not only as an important compilation of surveillance information on slaughterhouse practices, but also as a means of highlighting and focusing efforts for improvement on those practices that failed to protect animal welfare or in some cases, even caused welfare problems. The last report was published in March 2004. The decision to cease publishing this information was a serious backward step in terms of openness and information sharing. Following enquiries as to why this decision was taken, we were given to understand that funding from Defra to publish the data was no longer available to the MHS, so the report was no longer issued.

Recommendation: Data collected by the MHS in relation to animal welfare at slaughterhouses should once again be made publically available, at least every

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two years, in the form of a published report and/or easily accessible on relevant websites.

2.2 Training and licensing: Effective, animal welfare-focused training of all slaughterhouse staff should be seen as essential. Ensuring that the training relates not only to technical aspects such as proper maintenance and use of equipment, but also includes understanding of animal behaviour for the species in question, should be a legislative requirement, as should assessment of competence on a regular basis. It is of concern that licensed slaughter staff are not re-tested annually to check for continuing competency, despite the fact that there are often developments over time – such as introduction of new equipment or improved understanding of animal welfare and behaviour – that could be relevant to their work.

Recommendation: All licensed slaughter staff should be re-tested and re-trained at least annually to ensure maintenance of competence. All slaughterhouse staff who have contact with animals should receive regular animal welfare-focused training and competency assessment to ensure understanding and effective application of latest relevant information and skills

2.3 Supervision of operations: Animal Welfare Officers (AWOs) have a key role in ensuring a good level of animal welfare at the time of slaughter/killing through the implementation and maintenance of relevant requirements. They should be present at all times to oversee operations at the slaughterhouse in relation to animal welfare. They can also have an important role in training other relevant staff members and monitoring their duties. We are pleased that the revised EU Regulation requires the appointment of an AWO at every large slaughterhouse, though this will not come into force until 2013. We would, therefore, urge that this provision be implemented earlier in UK abattoirs. In addition, the exemption from this provision for smaller slaughterhouses is of concern. Whilst appreciated the economic issues faced by small abattoirs, in the absence of an AWO there may be no member of staff who has sole responsibility for animal welfare and therefore aspects relating to this may not be effectively addressed. The concept of the AWO was pioneered by the RSPCA in the early 1990s, and it is a requirement of the RSPCA welfare standards that processing plants have an attending AWO. Effective and regular training – ideally ‘validated’ - and competency testing of all AWOs is also essential to ensure new developments in animal welfare knowledge and legislation are transferred, absorbed and applied in practice. Whilst the new slaughter Regulation requires that AWOs have a certificate of competence, it does not require or give guidance on the frequency with which this competence needs to be tested and updated. In addition to AWOs, the Official Veterinary Surgeon (OVS) has an important monitoring and enforcement role to play. Unfortunately, their duties and powers in relation to animal welfare are not as specified clearly enough in the new slaughter regulation. The vet has an essential role to play especially in the control of Standard Operating Procedures, in checking AWO monitoring and recording systems, in controlling the compliance with various provisions, in continuously assessing the competence of operatives handling or slaughtering animals, and in taking the appropriate measures should a non compliance occur. It is paramount to emphasise the role the vet has in order to ensure they not only undertake ante and post mortem inspections relating to meat hygiene issues, but also play a major role in checking and influencing welfare within the lairage and at the point of slaughter. The following paragraph along the lines of the following could be usefully inserted into legislation: *The correct implementation of the above monitoring procedures must be checked daily by the Official Veterinary*

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Surgeon, and appropriate records kept. The daily welfare checks must include the welfare indicators and key parameters described in the Standard Operating Procedures.

Recommendation: The roles, responsibilities and competencies of Animal Welfare Officers and Official Veterinary Surgeons needs to be more clearly defined than in legislation, as does the frequency and nature of the reporting procedures undertaken by these staff. The requirement to appoint AWOs should become a requirement as soon as possible, ahead of the EU legislation in 2013. If smaller slaughterhouses are to be exempt from the requirement to appoint an AWO, other provisions must be put in place at these establishments to ensure animal welfare is effectively monitored and safeguarded.

2.4 **Ethical issues:** There are currently several livestock sectors in which the killing of newborn unwanted males, and other 'surplus' animals, is undertaken routinely. Clearly, some of the issues associated with these practices may be relevant to this Committee's current inquiry, since they relate to the welfare of the animals in question at the time of slaughter/killing. It is recognised that other aspects, such as the ethical considerations associated with routine pre-planned killing of newborn animals, fall outside the agreed scope of this Committee's inquiry. However, this is an area that the RSPCA would urge the National Assembly for Wales to consider. Livestock production systems that involve the routine production of animals that will simply be dispatched shortly after birth or hatching raises huge questions relating to 'wastage' of life and general ethical acceptability. We are aware that this practice is also of great concern to many livestock farmers themselves, though they cannot resolve the issue alone. We do not believe that such practices should continue to be considered as an acceptable and routine part of livestock farming. In addition, some of the methods used (and legally permitted) for killing newborn/newly hatched animals and birds (see also Section 3.3) are a cause for concern. Use of biotechnology (such as sexed semen to increase the proportion of pure-bred dairy calves that are female) and other innovative developments (such as developing and encouraging the market demand for 'unfashionable' animal products – such as beef from male dairy calves) should be deployed to obviate the need to destroy healthy newborn animals simply because they are currently deemed surplus to requirements under the current farming and marketplace structures. There are very real welfare risks associated with 'surplus' newborns as well. Their inherent lack of monetary value means that there is little incentive to ensure that their treatment whilst alive, and at the time of killing, is good.

Recommendation: Stricter legislative provisions and monitoring and enforcement of that law on the treatment and methods of killing of 'unwanted' newborn animals, including so-called hatchery 'waste', should be put in place. In addition, Government, together with all relevant livestock farming and food industry sectors, should consider ways in which the routine killing of 'surplus' newborns can be reduced and ultimately phased out.

3. Specific issues

3.1 **Catching, transport and lairage:** The way in which animals are caught and loaded on-farm, the quality and the duration of transport of animals to the slaughterhouse, and the conditions in the lairage on arrival, can have considerable bearing on their welfare prior to and at the time of slaughter. In the case of poultry, especially those of low economic value (see also Section 3.7 below), the catching process may not be conducted according to 'best practice'

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and hence the welfare of the birds may be compromised before they are even loaded onto the transporters. For example, catching and carrying chickens and laying hens by both legs improves welfare and reduces the likelihood of injury, as does training and proper supervision of the teams undertaking the catching. In relation to the journey to the abattoir, it is essential that the slaughterhouse, the farm and the haulier liaise to ensure that the timing of loading, transport and slaughter is planned to ensure the best outcome in animal welfare terms. Anecdotal evidence and our own experiences suggest that this is not always the case. Whilst some animals may benefit from a period of time resting (and calming down) in the lairage after arrival, this must be planned and be appropriate to the species and situation. Annex III, paragraph 1.2 of the new Regulation states: *Animals must be unloaded as quickly as possible after arrival and subsequently slaughtered without undue delay.* However, no maximum time between arrival and slaughter has been set. Of particular concern is the ambiguity and variable interpretation of legislative requirements relating to the permitted journey times for poultry. At present, EU law on live animal transport (and the resultant legislation - Welfare of Animals (Transport) (Wales) Order 2007) states that poultry may not travel for more than 12 hours without being fed and watered – disregarding loading and unloading times (see Annex 1, Chapter 5 of Council Regulation (EC) No 1/2005). The requirement has been interpreted such that ‘travel’ is seen as relating only to the period during which the poultry are actually on the move. This contrasts with other UK legislation for other species (cattle, sheep, pigs, goats, horses and ponies) where the journey time must take account of the time taken for both the loading and the unloading procedures. In the case of poultry, once the birds reach their destination – such as a slaughterhouse – the provision is no longer deemed to be relevant. In other words, birds can and do stay within their transport crates without food or water for sometimes very much longer than 12 hours. There is deemed to be no maximum period for which they can be confined in this way once the travel itself has ended. In practice, this can mean that poultry arrive at the slaughterhouse, and either remain on the vehicle for long periods of time or are unloaded (in their transport crates) into the lairage where they remain for sometimes many hours before being slaughtered. The RSPCA welfare standards for poultry species set out a number of specific provisions requiring improved practices in catching, transport and slaughter. The benefit of applying these provisions (that in a number of areas go beyond legislative requirements) was well illustrated by the outcome of a study in 2004/2005 (2). This involved 2.4 million chickens reared indoors and slaughtered according to RSPCA Welfare Standards and 10.5 million chickens that were reared indoors and were slaughtered according to Assured Chicken Production (industry assurance scheme) standards. Data were collected for key welfare parameters over a yearlong period using standardised methods at the slaughter plant and were independently analysed. RSPCA standards provided significantly ($P < 0.05$) better welfare in terms of fewer birds arriving dead at the slaughterhouse (0.05 v 0.17%), fewer slaughterhouse rejects (1.6 v 1.9%) and more birds being classified as Grade A (83.4 v 66.2%). As well as indicating the benefits (to birds and producers) of applying standards above current legislation and industry practice, these results give some indication of the level of losses for the parameters mentioned, which could be, at least in part, attributed to stress caused during the catching, transport and slaughter process.

Recommendation: Catching and loading of animals and birds on-farm must be subject to clear requirements to ensure best practice in welfare terms. Slaughterhouses, farmers and hauliers should liaise ahead of all livestock journeys to ensure appropriate timing of transport for the animals in questions. Legislation on welfare during transport needs clarifying to ensure poultry in

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particular are not subjected to long waiting periods without food and water prior to slaughter.

Conditions for all species in the lairage are of great importance in ensuring animals are calm and comfortable prior to slaughter. Whilst slaughter legislation refers to lairage conditions, interpretation and application in practice may not always be in line with best practice. Avoidance of mixing of strange animals is essential, as is appropriate lighting (e.g. dim lighting to calm animals), appropriate stocking densities in pens, appropriate temperatures for the species, ready access to water for all animals, avoidance of sudden loud noises, and knowledgeable surveillance and handling by all staff. Every slaughterhouse should have written protocols (Standard Operating Procedures) covering all the above issues, which must be applied at all times and must be reviewed by a competent authority and if necessary, improved to ensure acceptable animal welfare.

Recommendation: Slaughterhouses should have specified protocols on the necessary conditions and handling in the lairage for each species dealt with at a slaughterhouse to ensure the best possible welfare outcomes.

3.2 Handling and design of facilities: The way in which animals are handled at the slaughterhouse has a highly significant influence on their overall welfare. As outlined above, training and competency testing of all slaughterhouse staff who have any contact with animals needs to include instruction in effective and humane handling methods and animal behaviour. Confrontational, compulsion methods of driving animals, including use of electric goads, should be prohibited. Although legislation sets guidelines for use of goads, including limiting their use to specific circumstances and setting a maximum duration for each application, monitoring and enforcement of these provisions is inherently difficult. If goads are available on site, the possibility that they will be used in ways that do not comply with legislation is likely to be high. In addition, experience indicates that their use is not necessary and in fact can be counterproductive, causing animals to panic. Use of electric goads is prohibited under the RSPCA welfare standards for farm animals, as implemented through the Society's farm assurance scheme, Freedom Food. At slaughterhouses approved under the scheme, handling and slaughter of Freedom Food approved animals of all species is successfully achieved without any use of electric goads, providing tangible evidence that use of goads is not necessary. Any difficulties in moving animals through the slaughterhouse should be rectified through humane handling and improved design of the facilities to ensure animals are confident moving forward. Application of key principles including avoidance of sharp bends, avoidance of lighting contrasts (so animals don't have to move from very bright to dark/shadow areas or *vice versa*), should be a requirement for all race systems.

Recommendation: Electric goads should not be permitted in slaughterhouses. Areas through which animals are required to move should be designed to avoid likely 'obstacles' – such as sharp corners and inappropriate lighting – in order to facilitate smooth forward movement of the animals.

3.3 Use of gas mixtures: Current legislation in the EU and across the UK permits use of gas mixtures to kill livestock, though the detail varies with species. The RSPCA believes that gas killing offers a number of welfare advantages over other killing and slaughter methods, particular with respect to reducing or completely avoiding the handling of livestock prior to slaughter. Nevertheless, certain specifications must be adhered to, and some improvements in current practices associated with gas killing are still needed if

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welfare is to be safeguarded. For example, whilst UK law stipulates the use of inert gas mixtures (including for example Argon gas) to kill various poultry species, carbon dioxide (CO₂) mixtures can be used for killing pigs. Research clearly indicates that CO₂ is aversive to animals, and that breathing gas mixtures including high levels of CO₂ causes distress for several seconds prior to unconsciousness. This contrasts with the situation for inert gas mixtures, which research indicates are not aversive and hence cause unconsciousness and ultimately death through anoxia without prior distress. Interestingly, UK law differs from EU law on this point. The current and newly issued EU Regulation ((EC) No 1099/2009) on the protection of animals at the time of killing allows use of CO₂ to stun poultry, but via an amendment in 1999, the UK Government took account of research and prohibited use of gas mixtures to stun/kill poultry that included CO₂ concentrations above 30%. This positive welfare-based decision was not, however, extended to cover stunning/killing of pigs. In its report in 2003 on welfare of farmed [red meat] animals at slaughter or killing, the Farm Animal Welfare Council recommended that use of aversive gas mixtures should be phased out within five years. However, to date, this has not been achieved and apparently little progress has been made in designing and applying such systems in pig abattoirs. In addition, though UK law requires that pigs remain in the gas mixture until they are dead, experience indicates that this is often not happening. This situation need not result in animal welfare problems, as long as the pigs are unconscious when they leave the gas chamber and their throats are cut and death through bleed out is achieved prior to consciousness being regained. However, failure to kill pigs with the gas does introduce an additional *risk* to welfare that would not be present if the law was complied with. Improved monitoring and enforcement of this area would therefore be an advantage. While CO₂ continues to be used to stun/kill pigs, a concentration of at least 90% CO₂ should be used (legislation states a minimum of 70%). This is in line with research, recommendations by EFSA (3) and practical experience – all of which indicate that the higher concentration results in a more effective stun and a shorter time to loss of consciousness, which helps to reduce the duration of hyperventilation and potential distress. It is also of concern that surplus chicks at hatcheries may, under UK law, be killed using 100% CO₂. Alternative killing methods for so-called hatchery ‘waste’ – such as inert gas mixtures and maceration – are available and if undertaken effectively provide for better welfare. Use of high concentrations of CO₂ is therefore unnecessary and this method should be prohibited. Experience also indicates that the legislative requirement that it should be possible to view animals and birds within the gas chambers is often not being applied effectively. This failure could result in problems during this critical period of the killing process remaining undetected. Better enforcement of this provision would therefore be of benefit.

Recommendation: Legislation should require that the use of gas mixtures with high (above 30%) concentrations of CO₂ to kill any livestock should be phased out and replaced with systems using inert gas mixtures. Use of inert gas mixtures should become the routine method of killing poultry, with other methods (e.g. electrical stun-to-kill) being used only as an exception. Improved monitoring and enforcement of legislative requirements relating to ensuring pigs are actually killed (rather than just rendered unconscious) by gas mixtures is required. Whilst CO₂ continues to be used to stun/kill pigs, a minimum concentration of 90% CO₂ should be used. The legislative requirement that it must be possible to view animals and birds within the gas chamber needs to be more effectively enforced.

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3.4 **Slaughter without pre-stunning:** Current and the new legislation on welfare at slaughter allows an exemption to be made to the general prohibition on killing animals by cutting their throats without pre-stunning. The exemption is made on religious grounds, specifically allowing slaughter without pre-stunning to be undertaken by Jews and Moslems for consumption by Jews and Moslems. This position contradicts best and latest scientific information and practical experience that indicate that on welfare grounds, animals should always be rendered unconscious and insensible to pain before their throats are cut. Whilst the RSPCA recognises that religious beliefs and practices should be respected, we also believe that it is important to ensure that animals are killed in the most humane conditions possible. It is our view that scientific research has clearly demonstrated that the slaughter of an animal without pre-stunning can cause unnecessary suffering. The RSPCA is therefore opposed to the slaughter of any food animal without it first being rendered insensible to pain and distress before death supervenes. In 2003, the Farm Animal Welfare Council published part 1 (red meat animals) of its report on the animal welfare at slaughter/killing (1) in which it set out the available information on the effects on animal welfare of slaughter without pre-stunning, and concluded that: '*...slaughter without pre-stunning is unacceptable and that the Government should repeal the current exemption*'. The FAWC report also recommended that whilst slaughter without pre-stunning continued, there must be a requirement for a post-cut stun which would at least reduce the suffering of animals by avoiding a long period between throat cutting and loss of consciousness through blood loss. More recently, research undertaken in New Zealand in 2009 has provided further evidence of the welfare problems associated with neck cutting on conscious animals (4). The work showed that brain signals in calves indicate that they do appear to feel pain when slaughtered without pre-stunning. A pain signal lasting for up to 2 minutes was detected following throat cutting. The researchers also showed that when the animals are concussed through stunning, brain signals corresponding to pain disappear. In its response (in 2004) to the 2003 FAWC report, the UK Government stated that it would not ban production of Halal or Kosher meat. It cited its concern that a ban could simply result in such meat being imported and that this would in effect be 'exporting the problem, resulting in no overall improvement in animal welfare.' In other words, the UK Government did accept that slaughter without pre-stunning is an animal welfare 'problem'. In addition, the response stated that there was some merit in looking at introducing post-cut stunning of cattle in particular because of the time it takes for cattle to lose consciousness through blood loss. However, to date, it is not apparent that this area has not been pursued to any great extent. Consideration should also be given to the application of reversible stuns to animals destined for religious slaughter. It is our understanding that in some cases at least, if a stun is reversible i.e. does not result in the ultimate death of an animal, some within the religious communities in question believe that this does not contradict their religious 'rules' relating to slaughter. Use of non-penetrative captive bolt (NPCB) stunning - whereby the blow to the head causes a haemorrhage at the base of the brain causing an immediate loss of consciousness - should therefore be considered. The category of animals on which this can be used (as specified under the law) could be extended to ruminants between 12 and 24 months that are being killed by a method prescribed for religious rites. This may encourage the use and acceptance of pre-slaughter stunning amongst religious groups resistant to the use of other stunning methods, as a stun caused by a NPCB is reversible.

An additional concern is that some meat from animals slaughtered without pre-stunning may find its way onto the open market, and be unwittingly purchased

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and consumed by the general population. Not only is this a problem for those consumers who do not wish to support this slaughter practice, it is also contrary to the legislation that only allows slaughter without pre-stunning if the resulting meat is to be eaten by Jews or Moslems. It is, therefore, essential that all meat from animals slaughtered without pre-stunning be clearly labelled as such if sold on the open market. In its response in April 2004 to the 2003 FAWC report on red meat animal slaughter, the UK Government mentioned the issue of labelling of meat from animals slaughtered without pre-stunning, but again, no tangible progress has been made. Further detail on this issue and on the overall RSPCA position and recommendations can be found in the Society's 'Religious Slaughter' information sheet (5)

Recommendation: There should be no exemptions to the requirement for animals to be stunned and rendered unconscious before their throats are cut. If such practices are to be allowed to continue, stricter requirements to minimise suffering, including the application of an immediate post-cut stun, and specific validated training and competency testing of those undertaking the slaughter, should be introduced. In addition, it should be compulsory to label all meat from animals slaughtered without pre-stunning to indicate that this method of slaughter was applied. This would enable consumers to make an informed choice about what they buy and allow them to avoid conflict with legislation that prohibits all but Jews and Moslems from consuming such meat.

3.5 Stunning methods: Various stunning methods are currently permitted for various species. In each case, it is essential that the procedure is undertaken exactly in accordance with prescribed parameters relating to the type of equipment, the positioning of the equipment on the animal etc. In addition, it is essential that following stunning, the animals are bled without delay, and certainly within the following time periods:

8 seconds after head-only electric stunning of sheep
12 seconds after head-only electric stunning of calves
15 seconds after head-only electric stunning of pigs
23 seconds after head-only electric stunning of cattle
15 seconds after use of a captive bolt in a horned sheep (poll position)
15 seconds after use of CO₂
30 seconds after use of a non penetrative captive bolt
60 seconds after use of a penetrative captive bolt
These maximum 'stun-to-stick' intervals should be added to legislation.

It should be noted that under current legislation, there is a requirement that electrical stunning should not be undertaken unless the apparatus incorporates a device that prevents its operation *'unless a current can be passed which is sufficient to render an animal of the species being stunned unconscious until it is dead'*. However, to date, no such 'fail safe' device has been developed, so in effect, it is impossible for slaughterhouses to comply with this legislative requirement.

In addition to applying maximum stun-to-stick intervals, minimum 'sticking-to-dressing' intervals should also be dictated under the law. For red meat animals, no dressing procedure or any electrical stimulation should be performed on the animal before the bleeding has ended, and in any event not before the expiry of a period of at least 30 seconds for bovine and equine animals, and at least 20 seconds for other species after sticking. This interval should be extended respectively to 120 seconds and 30 seconds for animals that have not been stunned at time of slaughter. For poultry, no further processing should take

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place before the bleeding has ended and in any event not before the expiry of a period of at least 120 seconds for turkeys or geese, or 90 seconds for any other bird after sticking.

Recommendation: Additional, more specific provisions relating to maximum stun-to-stick intervals, and minimum stick-to-dressing intervals should be added to legislation and effectively enforced.

3.6 Electrical stunning/killing of poultry: Many poultry are stunned/killed by passing them through electrified water baths. If properly conducted, this method can be acceptable in animal welfare terms. However, there are some serious risks associated with its use, which must be reduced/eliminated. Key issues of concern include the fact that this method involves the shackling of live birds upside down, hanging by their legs, for sometimes a considerable period of time. In addition, birds may receive pre-stun shocks from the water bath (e.g. if wings enter first) before their heads enter the water and a stun is achieved. Also, most water baths use constant voltage systems, and hence the level of 'shock' received by birds in the water bath will depend on the resistance of those birds. As this will vary (e.g. with size of bird), the amount of current received by each bird will also vary and may not be sufficient to achieve an effective stun. Constant current water baths would overcome this concern, allowing effective control of the shock received by each bird. The aim should also be to kill the birds, rather than just stun them, in the water bath, helping to remove the risk of birds regaining consciousness before being bled out. To this end, alternating current (AC) should be used at a frequency of 50Hz, as this is the optimum frequency and waveform to induce cardiac arrest. Higher frequencies are sometimes used (and are permitted by law). They are perceived to reduce the risk of carcass damage in some poultry, but several poultry slaughterhouses are successfully using the lower frequency (e.g. those slaughterhouses operating to RSPCA welfare standards within the Freedom Food scheme). Given the serious welfare concerns associated with the live shackling of poultry (as clearly expressed by various bodies including EFSA (2) we believe that this technique should be phased out within 5 years, especially as suitable alternatives are in development. Some studies are reporting that head only electrical stunning should be possible whilst the bird remains upright. In the meantime, shackling should be limited to a maximum of one minute. In addition, Controlled Atmosphere (gas) Systems (CAS) are in use in numerous abattoirs in Europe, and offer an economically viable alternative for abattoirs killing more than 4000 birds/hour (see also Section 3.3). In 2008, 20% of poultry in the EU were killed using Controlled Atmosphere Systems. By the end of 2009, it is predicted that 80% of the German poultry market will be killing poultry using CAS methods. Also, it is estimated that c.90% of all turkeys in the UK are currently killed using CAS (see also Section 3.3).

Recommendation: Electrical water bath stunning, which involves the shackling and inversion of live birds, should be phased out within a 5 year period. However, in the meantime, low frequency constant current stunning systems should be adopted as they have the potential to offer a bird-specific stun, i.e. ensure the level of stun is suitable for each bird. Constant voltage stunning systems should be phased out and replaced with constant current systems. Systems that actually kill (rather than just stun) the birds should also be used.

3.7 Killing of end-of-lay hens and other vulnerable livestock: Animals and birds at the end of their productive lives are often physically very vulnerable, yet due to the dearth of slaughterhouses that deal with such 'cull' animals, their journeys to slaughter are often longer than those of other animals. The welfare of end-of-lay hens is of particular concern. These birds are of low

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economic value so there is little incentive to avoid bruising and injury at the time of catching and transport that could affect subsequent carcass quality. The long journey times that following the catching and loading add to the risk of welfare problems. The RSPCA believes that an alternative approach to the killing of laying hens should be considered and developed, namely on-farm killing. Some years ago, the Society co-funded a project that resulted in development of a mobile slaughterhouse in the Brecon Beacons. The unit could be moved around the area, and the procedures followed were compatible with both welfare and meat hygiene legislation, enabling the resulting meat to be sold for human consumption. For various reasons, the initiative did not continue long term, but it illustrated the potential for on-farm slaughter. Avoidance of long journeys for vulnerable livestock could have very significant welfare benefits, whilst such an approach could also be advantageous to farmers. Killing 'locally' rather than having to transport animals outside the local area for slaughter could also benefit those who are keen to ensure their products can be sold under a 'locally produced' label – something that is becoming increasingly sought by discerning consumers and which can in some cases command a premium for the producer. Although this issue is outside the immediate scope of this Committee's inquiry, we would suggest that development of on-farm killing facilities is given due consideration as an initiative that could be beneficial to all – animals, producers and consumers.

Recommendation: On-farm killing of certain species/classes of livestock is a viable option that benefits both animal welfare and farming businesses. Development of on-farm killing facilities that comply with animal welfare and meat hygiene legislation is possible and should be given due consideration and support.

3.8 **Pregnant animals:** If pregnant animals are slaughtered, consideration must be given to how their unborn offspring are dealt with at the slaughterhouse. Several specific provisions must be put in place, ideally through making them requirements under law. Best practice recommendations indicate that if the uterus remains intact, the foetus should remain *in utero* until it is dead. If there is any doubt about the status of the foetus, or if a conscious foetus is discovered in the womb of a slaughtered animal, it should be promptly removed, stunned with a penetrative captive bolt, and killed by exsanguination. Slaughterhouses should have suitable equipment readily available to perform the procedure promptly and effectively if required.

Recommendation: Specific operating procedures must be followed in the event of pregnant animals being slaughtered in order to reduce the risk of negative welfare impact on the unborn offspring.

4. Summary of recommendations and other information

4.1 Specific Recommendations

a) **Recommendation:** Data collected by the MHS in relation to animal welfare at slaughterhouses should once again be made publicly available, at least every two years, in the form of a published report and/or easily accessible on relevant websites.

b) **Recommendation:** All licensed slaughter staff should be re-tested and re-trained at least annually to ensure maintenance of competence. All slaughterhouse staff who have contact with animals should receive regular

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animal welfare-focused training and competency assessment to ensure understanding and effective application of latest relevant information and skills.

c) Recommendation: The roles, responsibilities and competencies of Animal Welfare Officers and Official Veterinary Surgeons needs to be more clearly defined than in legislation, as does the frequency and nature of the reporting procedures undertaken by these staff. The requirement to appoint AWOs should become a requirement as soon as possible, ahead of the EU legislation in 2013. If smaller slaughterhouses are to be exempt from the requirement to appoint an AWO, other provisions must be put in place at these establishments to ensure animal welfare is effectively monitored and safeguarded.

d) Recommendation: Stricter legislative provisions and monitoring and enforcement of that law on the treatment and methods of killing of 'unwanted' newborn animals, including so-called hatchery 'waste', should be put in place. In addition, Government, together with all relevant livestock farming and food industry sectors, should consider ways in which the routine killing of 'surplus' newborns can be reduced and ultimately phased out.

e) Recommendation: Catching and loading of animals and birds on-farm must be subject to clear requirements to ensure best practice in welfare terms. Slaughterhouses, farmers and hauliers should liaise ahead of all livestock journeys to ensure appropriate timing of transport for the animals in questions. Legislation on welfare during transport needs clarifying to ensure poultry in particular are not subjected to long waiting periods without food and water prior to slaughter.

f) Recommendation: Slaughterhouses should have specified protocols on the necessary conditions and handling in the lairage for each species dealt with at a slaughterhouse to ensure the best possible welfare outcomes.

g) Recommendation: Electric goads should not be permitted in slaughterhouses. Areas through which animals are required to move should be designed to avoid likely 'obstacles' – such as sharp corners and inappropriate lighting – in order to facilitate smooth forward movement of the animals.

h) Recommendation: Legislation should require that the use of gas mixtures with high (above 30%) concentrations of CO₂ to kill any livestock should be phased out and replaced with systems using inert gas mixtures. Use of inert gas mixtures should become the routine method of killing poultry, with other methods (e.g. electrical stun-to-kill) being used only as an exception. Improved monitoring and enforcement of legislative requirements relating to ensuring pigs are actually killed (rather than just rendered unconscious) by gas mixtures is required. Whilst CO₂ continues to be used to stun/kill pigs, a minimum concentration of 90% CO₂ should be used. The legislative requirement that it must be possible to view animals and birds within the gas chamber needs to be more effectively enforced.

i) Recommendation: There should be no exemptions to the requirement for animals to be stunned and rendered unconscious before their throats are cut. If such practices are to be allowed to continue, stricter requirements to minimise suffering, including the application of an immediate post-cut stun, and specific validated training and competency testing of those

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undertaking the slaughter, should be introduced. In addition, it should be compulsory to label all meat from animals slaughtered without pre-stunning to indicate that this method of slaughter was applied. This would enable consumers to make an informed choice about what they buy and allow them to avoid conflict with legislation that prohibits all but Jews and Muslims from consuming such meat.

j) **Recommendation:** Additional, more specific provisions relating to maximum stun-to-stick intervals, and minimum stick-to-dressing intervals should be added to legislation and effectively enforced.

k) **Recommendation:** Electrical water bath stunning, which involves the shackling and inversion of live birds, should be phased out within a 5 year period. However, in the meantime, low frequency constant current stunning systems should be adopted as they have the potential to offer a bird-specific stun, i.e. ensure the level of stun is suitable for each bird. Constant voltage stunning systems should be phased out and replaced with constant current systems. Systems that actually kill (rather than just stun) the birds should also be used.

l) **Recommendation:** On-farm killing of certain species/classes of livestock is a viable option that benefits both animal welfare and farming businesses. Development of on-farm killing facilities that comply with animal welfare and meat hygiene legislation is possible and should be given due consideration and support.

m) **Recommendation:** Specific operating procedures must be followed in the event of pregnant animals being slaughtered in order to reduce the risk of negative welfare impact on the unborn offspring.

4.2 Other information: The RSPCA produces and regularly reviews and updates welfare standards for all the major farmed species. These are implemented by members of the Society's higher welfare farm assurance scheme, Freedom Food and also used by many others in the UK and overseas. The standards include detailed requirements relating to welfare before and at the time of slaughter and killing. These standards are available as hard copies from the RSPCA Farm Animals Department or online at www.rspca.org.uk/welfarestandards

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