5. Knackers, hunt kennels and maggot bait farms

Introduction

5.1 Knacker’s yards, hunt kennels and maggot bait farms collect carcasses of diseased or injured animals that cannot be used for human consumption. They process them and dispose of the remains, usually to renderers. Knackers salvage many products of value, such as hides and any meat suitable for pet food. Hunt kennels collect and process these carcasses for food for their hounds. Maggot bait farms expose the carcasses to flies to encourage them to lay their eggs in the carcasses to produce maggots which are then sold for use as bait by fishermen.

5.2 These three types of business are relevant to the BSE story because of the possibility that BSE-infected material might have passed from them to renderers, or directly into feed for animals. All three make commercial use of carcasses that for health reasons cannot be used for human food. On occasions, they humanely slaughter animals that otherwise cannot be moved and dispose of dead animals. The industries also constitute a possible route by which infective tissue could come into contact with humans, especially those employed in them.

5.3 The definition of ‘knacker’s yard’ is common to the Slaughterhouses Act 1974, the Meat (Sterilisation and Staining) Regulations 1982 and the Food Act 1984. According to these, a ‘knacker’s yard’ was ‘any premises used in connection with the business of slaughtering, flaying or cutting up animals whose flesh is not intended for human consumption’. MAFF and local authorities regarded hunt kennels as falling within the definition only if they carried out business as a knacker. For further discussion of this legislation, see vol. 14: Responsibilities for Human and Animal Health.

5.4 The Inquiry heard no evidence that either local authorities or MAFF inspected maggot bait farms or considered them to fall within the definition of knackers’ yards.

5.5 This chapter describes in general terms what knackers did in 1986 and how their practices were affected by legislative changes post-BSE. Knackers process many more carcasses and produce much more waste than either hunt kennels or maggot bait farms. The chapter therefore looks principally at knackers, but also points up any significant differences between them and hunt kennels or maggot bait farms. The regulation of knackers arises from animal welfare considerations, and the protection of the environment and human health. These matters are described in vol. 14: Responsibilities for Human and Animal Health.

306 S437 Jackson
307 M11F tab 12
308 S437 Jackson
309 L17 tab 2, section 34; L1 tab 2B
310 T65 p. 87 – Mr Brian Etheridge, formerly of the Association of District Councils, was actually speaking about whether hunt kennels fell within the 1989 SBO Regulations which used the same definition of knacker’s yards. MAFF regarded hunt kennels which took in more fallen stock than they needed, in order to sell the surplus, as knacker’s yards, although the summary of MAFF returns was unable to say how common this was (see, for example, YB91/2.21/2.2)
5.6 In this chapter, a number of references are made to ‘sterilisation’ of unfit material or of Specified Bovine Offal (SBO). As noted in Chapter 1, ‘sterilisation’ is used in the same sense as in the Meat (Sterilisation and Staining) Regulations 1982 and the Bovine Offal (Prohibition) Regulations 1989, and does not refer to inactivation of the BSE agent.

Some features of the industry

5.7 Mr Nicholas Hibbett of the CIEH said in oral evidence that, by the mid-1980s, before the outbreak of BSE, knackery was an industry in decline:

Generally speaking knackeries were very much a dying trade. They were decreasing in number, their markets were shrinking, they were having problems meeting new legislation. In many cases for example they were solely dealing with hunt kennels, or with picking up dead stock from farmers. They actually provide a very valuable service to local farmers but they were struggling to meet the new requirements.311

5.8 According to State Veterinary Service (SVS) figures, in mid-1990 there were 126 knackers in England, Scotland and Wales, of which 107 sold meat from fallen stock for pet food. By May 1991, this total had dropped to about 100, of which most were selling pet food. At the same time, there were between 250 and 300 hunt kennels, and a few maggot bait breeders.312

5.9 An indication of the volume of animals processed by knackers and hunt kennels around this period is provided by the monthly figures for August 1990, during which knackers and hunt kennels in England, Scotland and Wales processed approximately 5,346 adult cattle and 13,404 calves.313

Trade associations

5.10 The Licensed Animal Slaughterers and Salvage Association (LASSA) is the representative body of the majority of operators of licensed knacker’s yards and fallen stock collectors in Great Britain. Hunt kennels are represented by a number of associations. These include the Masters of Foxhounds Association.

311 T56 Hibbett pp. 42–3
312 YB91/05.31/3.1
313 YB91/10.01/1.2
Processes involved in knackering in 1986

5.11 The Inquiry has relied on the Health and Safety Executive’s ‘Guidance for the Knackering (Including Hunt Kennels and Maggot Farms) and Rendering Industries’ for a general description of knackers’ practices.\textsuperscript{314}

Collection of animals and carcasses

5.12 A knacker would go onto the farm, to:

- put down an injured or diseased animal and remove its carcass; or
- collect the carcass of an animal that had already died; or
- transport an animal to his premises before putting it down.

5.13 Mr Peter Hewson, a MAFF Meat Hygiene Adviser, said in oral evidence that ‘knacker’s yards paid for animals that died on the farm; hunt kennels removed a number of dead animals free of charge’.\textsuperscript{315}

Slaughtering of animals

5.14 Any animal slaughtered in a knacker’s yard had to be stunned and slaughtered in the same way as it would have been in a slaughterhouse.\textsuperscript{316} See Chapter 2 for details.

Handling of carcasses

5.15 Once a carcass was in the knacker’s yard, the hide was removed for sale. The skull was split with a large cleaver, and the brain removed with a hook, knife or hand. The carcass was then winched into a hanging position, from where the internal organs could be removed. Next, the spine was split with a cleaver (it seems likely that in some cases a saw might have been used, as in slaughterhouses, but no evidence of this was received). The meat and offal were cut from the carcass in manageable portions using sharp knives, and either cooked, dried and sold as pet food, or sold or given to renderers with the other unwanted parts of the carcass. Methods used to cook the meat included pressure cooking and open cooking. This cooking was significant as it fulfilled knackers’ obligations to sterilise meat under the Meat (Sterilisation and Staining) Regulations 1982.

Destination of products

5.16 Knackers sold the hides or skins to tanneries for leather. The remaining tissue, including bone, fats and muscle, was reprocessed as sterilised animal feed or pet food, or sold to renderers. Hunt kennels and maggot bait farms used as much of the carcass as possible to feed their hounds or to breed maggots. The remaining parts of the carcasses were collected by renderers or disposed of as waste. Renderers which

\textsuperscript{314} YB92/6.09/7.1–7.4. The Guidance refers to splitting of the skull and carcass, and removal of the brain and spinal cord. As explained in the Chapter 3 on head-boning, the extent to which these practices occurred before the animal SBO ban in 1990 is uncertain
\textsuperscript{315} T34 p. 132
\textsuperscript{316} L17 tab 2, section 36 (Slaughterhouses Act 1974); Slaughter of Animals (Scotland) Act 1980, section 10
collected raw material from knackers, hunt kennels or maggot bait farms usually specialises in rendering low-grade material for use in animal feed. For more detail, see Chapter 6.

5.17 Most knackers sold meat and offal for pet food. However, their share of the total pet food market was not significant. Members of the Pet Food Manufacturers’ Association did not use knacker meat. In 1991, Mr Alan Lawrence of MAFF’s Animal Health Division wrote:

Their share of the pet food market overall is minimal. The [Pet Food Manufacturers’ Association] already claim to have about 98% of the market. If each knacker sold on average half a tonne (which is possibly on the high side) a week their contribution to the total volume of 1.4 million tonnes of pet food sold annually would be about 2,600 tonnes or just under 0.2%.

5.18 The Inquiry is not aware of how much material was sold by knackers to pet food manufacturers. However, both Pedigree Masterfoods and Spillers Petfoods, two of the largest pet food manufacturers in the country, said in submissions to the Inquiry that they only used raw materials derived from carcasses passed as fit for human consumption, and therefore did not source such material from knackers. Pedigree Masterfoods said that it had maintained this policy since the 1970s, while Spillers Petfoods had never purchased raw materials from knackers.

5.19 A 1990 SVS survey of knacker’s yards indicated that:

. . . the majority . . . sell sterilised unfit meat for this purpose (which may contain other offals e.g. liver), through a range of outlets, including direct sale, pet shops and to pet food manufacturers.

5.20 The same survey indicated that no hunt kennels were found to be selling sterilised unfit meat as pet food.

**General standard of knacker’s yards**

5.21 In 1991, a MAFF officer reported of knacker’s yards that:

. . . the general standard is very low with premises being of minimal construction, very old and in a poor state of repair with overall hygiene standards described as poor. A few come into the moderate category. Generally, there is no attempt to separate dirty from clean areas, facilities for sterilisation of equipment are usually non-existent and wash-hand basins for use of staff are more often absent than present.
Legislation applying to knacker’s yards and other premises

5.22 The Slaughterhouse Act required knacker’s yards to be licensed. However, the conditions attaching to the licence were minimal.322 Slaughtering of animals in a knacker’s yard was also regulated as in a slaughterhouse.

5.23 The Meat (Sterilisation and Staining) Regulations 1982 regulated ‘knacker meat’ (that is, meat and offal from an animal slaughtered in, or from a carcass brought into, a knacker’s yard).323 Under the Regulations, knacker meat had to be handled in the same way as unfit meat in a slaughterhouse: all meat and offal had to be sterilised or stained, unless it was to be sent to an excepted premises under authority of a local authority movement order. Treating meat by boiling it or by steaming it under pressure until every piece was cooked throughout constituted sterilisation under the Regulations.

5.24 Knacker’s yards were inspected annually by MAFF officials for compliance with the 1982 Regulations.324 In 1991, general compliance by knacker’s yards with these Regulations was not considered satisfactory.325

5.25 The Meat (Sterilisation and Staining) Regulations 1982 also required meat and most offal produced in premises other than a slaughterhouse or knacker’s yard (such as most hunt kennels and maggot bait farms) to be sterilised before being removed from the premises, or stained and removed under a local authority movement order.326 More detail about this legislation can be found in vol. 14: Responsibilities for Human and Animal Health.

Legislative changes and developments in the process post-BSE

5.26 The following Regulations and Orders are also considered in the chapters on slaughterhouses (Chapter 2), renderers (Chapter 6) and animal feed (Chapter 7).

Bovine Offal (Prohibition) Regulations 1989 (the 1989 SBO Regulations)

5.27 These Regulations introduced the concept of SBO, which was defined as the brain, spinal cord, spleen, thymus, tonsils and intestines of an animal slaughtered in the UK.327 The Regulations prohibited the sale or use of SBO in the preparation of food for human consumption (the human SBO ban). The object of the 1989 Regulations was to prevent SBO from entering the human food chain. In the case of knacker’s yards, that object had already been achieved by the Food and Drugs Act

322 YB91/5.31/3.1
323 L17 tab 15. The equivalent Scottish legislation was the Meat and Poultry (Staining and Sterilisation) (Scotland) Regulations 1983 (L10 tab 4). The equivalent Regulations in Northern Ireland were the Meat (Staining and Sterilisation) Regulations (Northern Ireland) 1984
324 T125 p. 117
325 YB91/01.17/1.1; YB91/9.27/3.2
326 Article 13 in effect prohibits the removal from any premises, other than a slaughterhouse or knacker’s yard, of meat unfit for human consumption, cut from an animal which died or was slaughtered in such premises, or which died or was slaughtered before being brought onto such premises, unless the meat has been stained or sterilised. There is a legislative presumption that meat from such an animal is unfit for human consumption
327 L2 tab 3
1955 and the Meat (Sterilisation & Staining) Regulations 1982, which treated all knacker meat as unfit for human consumption.

Voluntary animal SBO ban

5.28 On 9 November 1989, in response to the Regulations banning SBO in food for humans, most animal feed manufacturers agreed to adopt a voluntary ban on the inclusion in their feeds of any MBM derived from SBO. A similar ban had already been recommended by the Pet Food Manufacturers’ Association in June 1989.328 We describe the effect of the voluntary animal SBO ban below, when dealing with the Bovine Spongiform Encephalopathy (No. 2) Amendment Order 1990.

Bovine Spongiform Encephalopathy (No. 2) Amendment Order 1990

5.29 This Order, implementing the animal SBO ban, came into force on 25 September 1990.329 Its purpose was to extend the prohibition on the use of SBO in human food to feed for all animals and poultry. See vol. 5: Animal Health, 1989–96 for a full account.

5.30 The Order extended the definition of ‘animals’, previously restricted to ruminants, to all mammals except man, and to any kind of non-mammalian four-footed beast.330 ‘Specified Bovine Offal’ was defined in the same terms as it had been in the human SBO ban.331 The effect of these provisions was therefore to prohibit the sale or supply of SBO, feedstuffs containing SBO or protein derived from SBO for feeding to animals and poultry, or the direct feeding of such material to animals or poultry. Since the Order adopted the same definition of SBO as in the 1989 Regulations by reference to an animal ‘slaughtered in the United Kingdom’, it did not apply to SBO from fallen stock or, arguably, from animals put down on the farm rather than slaughtered in the slaughterhouse. Fallen stock comprised a significant proportion of material handled by knacker’s yards and hunt kennels.

Pet food

5.31 The 1990 Order prohibited both the feeding of SBO to animals in pet food and its sale as pet food. The 1990 SVS survey of knackers and hunt kennels indicated that knackers did not sell the offal classified as SBO, either to pet food manufacturers for use in manufactured pet food, or as an end-product for pet shops and retail buyers.332 However, it was reported that there was in any case a ‘decreasing demand for pet food from knackers following the media publicity about BSE and, in particular, the cat encephalopathies’.333

5.32 The 1990 SVS survey showed that about 25 per cent of hunt kennels fed offal classified as SBO to their hounds (generally spinal cord left in the carcass), a practice not statutorily prohibited at the time.334 As late as November 1995, a MAFF memo noted that a number of hunt kennels were ‘deliberately infringing’ the animal

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328 M24 tab 6, p. 6; S163 Malin para. 5
329 L2 tab 5 article 8
330 L2 tab 5 article 2
331 L2 tab 5 article 2
332 YB90/7.23/20.1–20.2
333 YB91/2.25/1.1
334 YB90/7.23/20.1–20.2
SBO ban by feeding whole spinal columns to their hounds, with seven of them continuing to do so even after being warned by SVS officers. 335

Rendering for animal feed

5.33 Even before the 1990 Order, feed compounders who adhered to the voluntary animal SBO ban insisted that the MBM supplied to them should not be made from knacker meat. This remained general practice after the 1990 Order. Mr Iain Crawford, former Director of MAFF’s Veterinary Field Service, said in oral evidence that:

I believe that the renderers said anything coming from knackers would be SBO, the whole lot would be regarded as SBO. They could not separate it, or at least they did not want to separate it. It was worthless material, all of it. 336

5.34 This would mean that all knacker meat was either rendered separately as if it was SBO, or rendered with SBO from other sources, and the derivative MBM buried or incinerated. However, MAFF noted that some renderers were charging different amounts for knacker waste (see below). This suggests that not all renderers were treating all knacker waste as SBO.

5.35 The most dramatic impact of the animal SBO ban on knackers was economic. Profitable markets for MBM derived from SBO were now non-existent, and tallow derived from SBO was usually of low value. As renderers began to treat knacker waste as SBO, they started charging knackers instead of paying them for its removal from the knacker’s yards. Some declined to accept any material from fallen stock at all. In addition, the knackers had to employ extra labour to remove the SBO when dressing the carcass. In a statement to the Inquiry, Mr C E Ashworth, on behalf of LASSA, implied that charges were levied by renderers from the time the 1989 SBO Regulations came into force. 337 The practice appears likely to have begun in response to the voluntary animal SBO ban, which was introduced in the same month. In 1991, MAFF summaries of returns on the disposal of carcasses and waste from knacker’s yards and hunt kennels reported that some renderers were charging between £40 and £200 per tonne of knacker waste, depending on the renderer and whether it was SBO or not. 338 The earliest of these summaries of returns notes that ‘charges for the collection of waste material seem to be increasing in some areas’, which implies that renderers had been levying charges for some time. 339

Effect of charges by renderers

5.36 In an attempt to recover some of their increased costs, knackers, having previously paid farmers for their cattle carcasses, now began charging farmers to remove carcasses from their land. The charges for cattle ranged from nothing in some cases for fresh carcasses, up to £60 per animal for days-old carcasses. For calves, the charges ranged from £0 to £40. 340 Throughput at many knacker’s yards decreased about this time, by up to 80 per cent in one case, and there were reports

335 YB95/11.10/12.2
336 T125 p. 117
337 S514 Ashworth
338 YB91/8.23/1.1
339 YB91/1.17/1.1
340 YB91/3.19/3.1; YB91/6.25/2.1
of knackers closing down. This decline was attributed to the reluctance of farmers
to pay knackers’ collection charges.\textsuperscript{341} Reports were received by MAFF of
carcasses either being dumped outside knackeries or hunt kennels, or simply being
left unburied on farms or roadsides.\textsuperscript{342}

5.37 By 1991, MAFF inspections of knacker’s yards and hunt kennels had been
stepped up to a monthly basis,\textsuperscript{343} even though the SBO Regulations were still
confined to cattle that were slaughtered. Mr Crawford told the Inquiry that local
authorities also ‘treated the knackers as though they were covered by the regulations
in respect of SBOs’.\textsuperscript{344}

5.38 Another trend identified during 1991 was a move by increasing numbers of
hunt kennels towards acting as knackers and collecting carcasses at a lower rate than
that being charged by knackers.\textsuperscript{345}

**Bovine Spongiform Encephalopathy Order 1991**

5.39 The 1991 BSE Order came into force on 6 November 1991. It consolidated all
BSE Regulations made under the Animal Health Act 1981 – ie, provisions
implementing compulsory notification, slaughter and compensation, the ruminant
feed ban and the animal SBO ban. It also amended the definition of SBO to include
SBO from fallen stock. Thus knacker’s yards and hunt kennels were prohibited
from selling or supplying SBO from fallen stock for feeding to animals and from
feeding such SBO directly to animals.\textsuperscript{346}

5.40 No evidence was received from knackers about changes in practices brought
about by this Order, and evidence received from MAFF is conflicting. Mr Iain
Crawford indicated that MAFF inspections were not in fact concerned with
separation of SBO from non-SBO material, on the basis that it would all go to
renderers and be treated as SBO anyway.\textsuperscript{347} On the other hand, a memo from Mr R
J Lawrence to Mrs S Townsend, both of MAFF, dated 26 October 1992, noted a
deficiency in compliance with the SBO Regulations at hunt kennels, namely, failure
to separate SBO.\textsuperscript{348}

**Animal By-Products Order 1992**

5.41 The Animal By-Products Order 1992 came into force on 1 January 1993 and
regulated the disposal of animal by-products.\textsuperscript{349} Animal by-products were defined
as any carcass or part of a carcass not intended for direct human consumption, but
not including animal excreta. This definition included all waste material from
knackers, hunt kennels and maggot bait farms.

5.42 The Order required knackers, hunt kennels and maggot bait farms to dispose
of certain classes of potentially hazardous animal by-products (SBO) by rendering
in approved premises, incineration or burial. Other, less hazardous, types of animal

\textsuperscript{341} YB91/01.17/1.1
\textsuperscript{342} YB91/2.20/1.1–1.2; YB91/01.17/1.1
\textsuperscript{343} YB90/12.18/2.1
\textsuperscript{344} T125 p. 120
\textsuperscript{345} YB91/2.20/1.1; YB91/4.24/10.1
\textsuperscript{346} L2 tab 7 article 4
\textsuperscript{347} T125 p. 117
\textsuperscript{348} YB92/10.26/3.1–3.2
\textsuperscript{349} L1 tab 11
by-product were regulated by the Order, but an exception was made to allow their distribution to or use in knacker’s yards, hunt kennels and maggot bait farms. For example, these premises could still sell these by-products as pet food or feed them to the hounds. The Order also placed conditions and restrictions on the movement of animal by-products, and it required hunt kennels and maggot bait farms to be registered with MAFF, for the first time.

**Specified Bovine Offal Order 1995**

5.43 This Order, made under the Animal Health Act 1981, came into force on 15 August 1995. It replaced and extended the previous provisions relating to SBO in the Bovine Offal (Prohibition) Regulations 1989 and the BSE Order 1991. The measures introduced by the 1995 Order included the requirement that SBO removed from knacker’s yards, hunt kennels or maggot bait farms be stained with Patent Blue V, unless it was intended for non-food or non-feedstuff purposes, or for research purposes. Sterilisation was no longer a permissible alternative to staining. In addition, SBO had to be prevented from coming into contact with any other animal material while on these premises, and had to be disposed of in accordance with the Order. The Order prohibited the removal of the spinal column in any place other than a slaughterhouse (see vol. 5: Animal Health, 1989–96).

5.44 MAFF did, however, take a ‘pragmatic approach’ to the staining rules, and decided that:

> . . . if SBO material is going to be incinerated on the hunt kennel or knackery premises immediately after removal then it need not be stained. But if it is going to be stored on the premises for a period, even if it is going to be incinerated there later, then it must be stained to prevent any possibility of it becoming mixed up with other non-SBO waste.351

5.45 The Masters of Foxhounds Association told the Inquiry in a written submission that:

> . . . some Hunts have installed their own incinerators. However, these are expensive both to put in and to run, and planning and licensing requirements mean that this is not always possible.352

5.46 MAFF’s summaries of returns also showed that some hunt kennels were installing incinerators in which to dispose of SBO, but did not reveal how many had done this.