FAWC REPORT ON THE WELFARE OF FARmed ANIMALs AT SLAUGHTER OR KILLING - PART 1: RED MEAT ANIMALs

DEFRA RESPONSE TO RECOMMENDATIONS

Design, construction and operation of the slaughterhouse

Recommendation 25:
Efficient scheduling procedures should be implemented by slaughterhouse operators so that animals do not have to wait to be unloaded.

Response: Accept. Efficient scheduling procedures provided benefits for producers, transporters and processors. In addition there are obvious animal welfare benefits. There is the added advantage that they reduce the number of vehicles waiting to use the cleaning and disinfection facilities. However, it is the responsibility of the producer, the transport operator and the plant operator to organise these scheduling procedures. Guidance on scheduling will be provided in the Code of Practice. It has to be recognised that on occasion factors outside the control of the transport or plant operator (traffic accident delaying arrival, major breakdown of equipment, etc.) result in a backlog of vehicles waiting to enter the plant. In this situation it is the responsibility of the transport operators to ensure that they comply with all the requirements of the relevant legislation.

Recommendation 26:
If animals' waiting time on lorries regularly exceeds 30 minutes, it is incumbent on the OVS to take enforcement action.

Response: Do not accept. The Official Veterinary Surgeon (OVS) does not supervise all unloading and the Meat Hygiene Service (MHS) is concerned that this proposed change could lead to 'hasty' unloading that would compromise animal welfare. However, when OVSs are alerted to problems over waiting times, they will be able to give advice on scheduling (see above).

The MHS take enforcement action to protect animal welfare within the requirements of the Welfare of Animals (Slaughter or Killing) Regulations 1995 (WASK) and notify the Local Authorities in cases of non-compliance with the Welfare of Animals (Transport) Order 1997 (WATO). Additional legislation would be required to enforce the proposed new time limit. Action is already taken where animals are exposed to avoidable excitement, pain or suffering, or where they need protection from adverse weather, etc.

Recommendation 31:
Government should make it a legal requirement that slaughterhouses provide facilities to enable animals to exit lorries on the level, in all but low throughput slaughterhouses.

Response: Accept. Many slaughterhouses already have unloading bays with level surfaces. Those that do not will be required to take steps to provide level unloading bays. This recommendation will require changes to legislation and will need to be phased in to allow operators time to make the necessary structural alterations. We will consider the impacts and consult with industry before introducing this requirement.

Recommendation 32:
Detailed guidance should be produced by Government relating to design of unloading bays, as well as unloading points for farm trailers. This information should be widely distributed to all slaughter premises.

Response: Do not accept. Such information is already available from the Meat and Livestock Commission (MLC) who have standard drawings and construction details. The Code of Practice for red meat slaughterhouses will direct operators to relevant sources of information.

Recommendation 36:
A designated and competent member of staff, who has been trained in animal welfare, must be required by law to be present throughout unloading and their duties should be outlined in a code of practice.

Response: Partially accept. The Government will consider this recommendation further. The training should be by a designated training provider or provided in-house. The requirement that a member of staff trained in animal welfare should be present every time animals are unloaded may not be practicable. Lorries sometimes arrive out of hours, as a result of delays during the journey, where a trained member of staff is not available. A new EU Council Regulation on the protection of animals during transport includes the provision for trained, competent operators to be present throughout the journey, including at unloading.

Recommendation 37:
The MHS must ensure that its staff receives training and regular updating on legislation relating to welfare during transport, and there should be greater co-operation with Local Authorities on transport issues.

Response: Accept. The MHS will approach the Local Authorities Coordinators of Regulatory Services (LACORS) to discuss improving co-operation with Local Authorities and agreeing a standardised approach throughout GB. Regional Veterinary Advisors and Principal OVSs regularly attend regional animal welfare meetings with Local Authorities to discuss these issues.
The OVS designation course provides an understanding of WATO and OVSs are updated through the Operations Manual. In addition, OVS contracts require the contractor to develop a training plan according to the individual needs of each OVS.

**Recommendation 38:**
Local Authority enforcement officers should undertake regular checks on livestock transporters at slaughterhouses.

Response: Partially accept. There will be a need to ensure that there is no duplication of effort between the Local Authority enforcement officers and the plant OVS.

Transport checks at slaughterhouses are currently carried out by some Local Authorities. A pilot Framework Agreement on delivery of services is being developed in England and Wales to improve consistency of service delivery and standards. It is expected that the pilot scheme can be extended to all Local Authorities.

**Recommendation 42:**
The slaughterhouse operator must ensure that isolation pens are kept ready for their intended use.

Response: Accept. It is a requirement of WASK that sick or disabled animals are kept apart from healthy animals. It will be re-emphasised in the MHS manual that the OVS checks that the operator has an isolation pen ready for use.

**Recommendation 43:**
The slaughterhouse operator must ensure that procedures for emergency slaughter, and the telephone number of an out of hours duty slaughterman and other emergency contacts, are clearly displayed at the unloading point so that any animal in obvious pain or distress on arrival at the slaughterhouse can be slaughtered or killed immediately.

Response: Accept. Plant operators will be asked to ensure that this information and all necessary equipment are available at the unloading point. However, when there is the need to recall the slaughterman to the slaughterhouse this will inevitably mean that the animal cannot be slaughtered or killed immediately.

**Recommendation 47:**
Lairage times optimal for animal welfare, along with needs for water feed and space over time, for each species should be included in Government’s code of practice.
Response: Accept. The Government will investigate the availability of such information with a view to including it in the Code of Practice. If this information is not available the Government will consider the possibility of commissioning the necessary research. However, it is not entirely clear what is intended by ‘lairage times optimal for animal welfare’. This may depend on a number of factors, e.g. journey time to abattoir, type of transport, weather conditions, etc., and may vary for animals within a particular species as well as between species, but in practice the shortest time possible would, in most cases, be the optimal time. Operators will need to take this into account when scheduling deliveries.

Recommendation 51:
The Food Standards Agency should ensure that the approval process for new premises, currently undertaken as a means of ensuring compliance with meat hygiene requirements, should include animal welfare objectives.

Response: Accept. The licensing process for slaughterhouses carried out by the Food Standards Agency (FSA) already takes account of animal welfare objectives. Regulation 4(2)(a)(i) of the Fresh Meat (Hygiene and Inspection) Regulations 1995 as amended, provides that the requirements of Parts I and II of Schedule 2 to WASK must be complied with before a licence is granted.

Recommendation 52:
The Food Standards Agency should ensure that all slaughterhouses undergo a formal review of their structural approval every five years to ensure animal welfare requirements are met.

Response: Do not accept. The FSA considers that the full time presence of MHS officials at licensed slaughterhouses already provides a more frequent opportunity than is being recommended to review the structural approval and ensure that animal welfare assessments are met. The obligations on MHS staff to monitor welfare standards are clearly set out in their Operations Manual. Where requirements under Parts I and II of Schedule 2 of WASK are not being met, the FSA has powers to revoke the premises' licence. Audit visits by the Veterinary Meat Hygiene Advisers (VMHA) also take structural issues into account.

However, the new EU Food Hygiene Regulations require all slaughter premises to be re-approved post-2006 and this will reaffirm that all animal welfare requirements are being met.

Recommendation 55:
When designing new slaughterhouses or re-designing existing ones, operators must ensure compliance with the legal requirement that the place of slaughter or killing should be sited so as to minimise the handling of the animal.
Response: Accept. It is to the advantage of the slaughterhouse operator to minimise handling and reduce stress on the animal as this not only ensures the slaughter operation runs smoothly, but also has meat quality advantages. The Government will remind operators in the Code of Practice of the legal requirement to minimise the handling of animals in slaughterhouses.

**Recommendation 59:**
Government should issue guidance to slaughterhouses on suitable species-specific solutions for non-slip flooring. More evaluation is needed of new materials that might provide a non-slip but hygienic, easy clean surface.

Response: Partially accept. While the use of non-slip floors is to be welcomed, many common areas within a slaughterhouse will be used by more than one species. In this situation the issue of guidance on species-specific non-slip flooring may not be the best solution. What may be required is the best compromise material for a variety of species. It is true that some materials sold as providing a non-slip surface have proved to be not very hard wearing, and a damaged surface can prove to be no better, and possibly even worse, than a concrete floor. The recommendation that the Government should evaluate new materials for their non-slip and hygienic, easy to clean characteristics will be considered in the context of existing research results before being considered for inclusion in Defra's research programme. Any research work undertaken should be linked with investigations into suitable non-slip floors for use on-farm and in markets.

**Recommendation 60:**
Slaughterhouse operators and the MHS should implement a scoring system of animals' slips and falls as a means of regularly assessing floor conditions, design problems and standards of handling in their slaughterhouse.

Response: Partially accept. In the experience of the MHS, scoring systems are subjective, controversial and difficult to apply. It is difficult to assess whether the condition of the floor, the design of the slaughterhouse or the handling of the animal made the major contribution to the slip or fall. Action should be taken based on objective evidence without the need to apply a score. However, an assessment by MHS and competent slaughterhouse staff of where/when animals slip and fall should be made so that action can be taken to remedy the problem.

The new EU Food Hygiene Regulations put the responsibility for compliance with legislation on the operator. It would sensible for operators to maintain a record of slips and falls so that action can be taken as necessary. The Government will consider including a recommendation for monitoring slips and falls in the industry guide to best practice.
Recommendation 67:
The slaughterhouse operator should monitor levels of vocalisation within the handling system and, where they are beyond acceptable limits, should identify the cause of the problem and rectify it (see Appendix D).

Response: Accept. It is accepted that the level of vocalisation is an indicator of possible problems with the handling systems in slaughterhouses. However, vocalisation levels are particular to each slaughterhouse and species. Therefore, it is incumbent on the operator to identify areas in the handling system with higher than expected levels of vocalisation for the species being processed. It will then be the responsibility of operators to take action to rectify any problem.

Recommendation 68:
Government should fund research on noise in slaughterhouses and its effects on the welfare of livestock. This should lead to maximum noise levels and exposure limits being set for animals. This should be supported by guidance from Government for slaughterhouse operators on practical steps to baffle or reduce noise.

Response: Partially accept. We would encourage operators to take steps to reduce noise levels within the lairage and handling systems. The Government will issue guidance on steps to baffle or reduce noise levels in its Code of Practice.

Recommendation 71:
Government should provide specialist advice on lairage ventilation. In addition, there should be clear guidance on limits for temperature, ammonia, concentration and humidity for slaughterhouse lairages.

Response: Partially accept. The Government will investigate the availability of data on lairage ventilation with a view to providing advice in the Code of Practice. Further research into limits for temperature, humidity and ammonia levels may be required but again this will have to fit in to the Department’s overall research programme. A decision on whether further research is required will take into account the current availability of data. Lairage times will also need to be taken into account when assessing the adequacy of ventilation systems. Ammonia levels that are acceptable in health and safety terms for lairage workers should not be so high as to cause problems for animals that are in the lairage for relatively short periods.

Recommendation 76:
Government should provide advice on optimum schedules for feeding and watering prior to slaughter, taking into account the travelling and marketing time animals may have undergone.
Response: Partially accept. The Government will consider the issue of optimum feeding and watering schedules. However, as WASK requires that drinking water should be available from appropriate facilities to all animals kept in the lairage at all times it is not clear that scheduling is the problem. It would appear from the report that it may be the number of drinking points available in each pen that is at issue. If the stocking rate in an individual pen is such that not all animals have access to water this is an enforcement matter for the OVS (see below). The provision of advice on feeding schedules is far more complex as it will depend upon information being available on when and where the animal was last fed, journey times, length of stay in market (if relevant), etc.

Recommendation 77:
The MHS should remind slaughterhouse operators of the legal requirement to make water available to all animals at all times in the lairage and ensure that this is enforced.

Response: Accept. The MHS actively enforces this provision in licensed slaughterhouses, but believes it would be helpful to have a legal notice restricting the use of individual pens without suitable water provision for the type of stock being held. The Government will investigate the possibility of introducing such legal notices.

Recommendation 79:
Government should issue guidance on minimum space allowances based on existing knowledge. These should be published as a matter of urgency. Research should be conducted to establish optimum stocking densities for all species applied across a range of circumstances.

Response: Partially accept. The Government will investigate the availability of data on minimum space allowances. Once the availability of such data has been established, the Government will consider whether further research is required. If sufficient data are available the Government will discuss with interested parties with a view to issuing draft guidance on maximum stocking densities by species. These will be published in the Code of Practice.

Recommendation 82:
Government should issue guidance to operators on the effects of mixing of livestock in slaughterhouses.

and

Recommendation 83:
Slaughterhouse operators should ensure that their lairage design reflects the need to avoid mixing unfamiliar groups of either cattle or pigs.
Response: Accept. The Government will issue guidance in the Code of Practice on the effects of mixing unfamiliar groups of cattle or pigs in the lairage. Operators will be advised when constructing new slaughterhouses, or modifying existing lairages, that the mixing of unfamiliar groups of animals should be avoided. However, it must be recognised that there may be occasions when, for example, a small number of animals are delivered to the slaughterhouse, there may be no alternative to lairaging them in a pen with another group of animals.

Recommendation 85:
Government should issue guidance on showering regimes for pigs in slaughterhouse lairages in its code of practice.

Response: Accept. Guidance will be included in the Code of Practice.

Recommendation 89:
Government must ensure that field lairages contiguous to slaughterhouses are defined as being within the curtilage of the premises.

Response: Do not accept. All animals intended for human consumption must undergo ante-mortem inspection within 24 hours of arrival at slaughterhouse premises, including welfare checks. If the welfare of any animal causes concern, including those coming from fields owned/leased by the slaughterhouse operator, the MHS takes appropriate action.

The FSA is responsible for the licensing of slaughterhouse premises under the Fresh Meat (Hygiene and Inspection) Regulations 1995. In appropriate circumstances, a field contiguous to a slaughterhouse and used for lairaging may be included within the boundary of the licensed premises. However, the FSA does not wish to encourage the use of field lairages, for a number of reasons:

- The frequent movement of stock from several sources in and out of field lairages can lead to a build-up of food-borne pathogens in an environment that cannot be cleansed and disinfected. Field lairages can lead to higher animal density. It is also more likely that the hides of animals can become dirty more easily. Both aspects increase the risk of contamination of meat during subsequent slaughter. More generally, lairaging of animals in fields is not compatible with the Clean Livestock Policy that sets clearly defined standards for cleanliness of sheep and cattle presented for slaughter for human consumption.

- It could present problems for slaughterhouse operators since, under animal health rules, animals must be slaughtered within 48 hours of arriving in the lairage. Where operators use fields to hold animals awaiting slaughter, this is usually to provide longer holding periods than allowed under the Meat Hygiene Regulations.
• It would present practical enforcement problems for the MHS, as any animals intended for human consumption must undergo ante-mortem inspection within 24 hours after arrival at the premises and not more than 24 hours before slaughter. This could mean inspections have to be carried out after dark or in inclement conditions and may have to be repeated before slaughter.

However, while field lairages continue to be used Defra will discuss with the MHS how field lairages contiguous to the slaughterhouse could be monitored to ensure that animal welfare is maintained without contravention of the law.

Recommendation 90:
Government should issue guidance on the proper management of field lairages to prevent the risk of disease build up, preserve good conditions underfoot and maintain adequate pasture.

Response: Accept. The Government will, in consultation with interested parties, prepare guidance for the proper management of field lairages where these exist contiguous to the slaughterhouse.

Handling of animals prior to stunning

Recommendation 95:
Government and the industry should establish a design resource, based on the best available data from research and practice, for animal handling systems from unloading up to the point of slaughter.

Response: Do not accept. The Government cannot commit to funding the establishment and maintenance of a design resource facility. It will, however, investigate with industry the availability of data and inform operators on where such design data may be obtained.

Recommendation 97:
Government should ensure that any future introduction to Great Britain of methods of animal identification take account of the welfare implications of animal handling in slaughterhouses.

Response: Partially accept. The requirements for animal identification in slaughterhouses will be one of the requirements taken into account when any new methods of animal identification are introduced. It is anticipated that new methods of electronic identification will be more animal welfare friendly when used in conjunction with electronic readers in slaughterhouses. However, animal identification rules are now a matter of EU competence and the type of
identification, equipment for recording identification, etc., will need to meet the varied needs of farmers, markets, transporters and processors.

**Recommendation 102:**
Slaughterhouse operators should actively discourage presentation of dirty livestock for slaughter and should not see the provision of a routine cleaning service as a routine part of their operation. If a producer persistently presents dirty animals for slaughter the OVS should instigate an investigation through the SVS.

Response: Partially accept. The MHS already encourage operators to accept only clean animals through their Clean Livestock Policy. However, it is for the slaughterhouse operator to decide whether to accept a dirty animal and to provide a cleaning service.

**Recommendation 103:**
Government should issue guidance to slaughterhouse operators and enforcement officers with regard to acceptable equipment and procedures for cleaning of animals.

and

**Recommendation 104:**
Where clipping and shearing has to be carried out at the slaughterhouse, facilities should be suitable for the purpose and the procedure carried out by trained, competent operators.

and

**Recommendation 105:**
Where washing has to be undertaken at the slaughterhouse we recommend that water pressure and temperature limits are set and if any animal shows obvious signs of distress or requires unreasonable levels of restraint, pressure washing should be ceased immediately.

Response: Accept. The Government will seek advice on acceptable equipment and procedures for cleaning animals with a view to publishing guidance in the Code of Practice. Guidance will be issued to OVSs in red meat slaughterhouses on clipping and shearing procedures. The need to establish specific training courses will be investigated. Where washing is undertaken, the MHS are already required to act if any animal is subject to avoidable excitement, pain or suffering. The recommendation requires the water pressure and temperature limits to be set, so guidance will be required for best practice. The Government will seek advice on appropriate pressure and temperature limits by species and issue guidance in the Code of Practice.
Recommendation 108:
Electric goads should only be used in exceptional circumstances.

Response: Accept. Guidance on the use of electric goads in “exceptional circumstances” will be included in the Code of Practice. The OVS already takes action if there is inappropriate use of electric goads.

Recommendation 109:
The slaughterhouse operator should monitor levels of goading within the handling system and, where they are beyond acceptable limits, should identify the cause of the problem and rectify it (see Appendix D).

Response: Accept. We will recommend that slaughterhouse operators adopt this recommendation. Guidance will be provided on “acceptable limits”.

Recommendation 113:
FAWC believes that horned cattle, or recently de-horned cattle with unhealed wounds, should not be presented for slaughter, with the exception of defined specialised breeds of cattle for which specific arrangements should be made.

Response: Accept in principle. However, the Government will consult with the farming industry, transport operators, slaughterhouse operators who currently deal with specialised breeds, and other interested parties on this proposal before issuing guidance. The Government recognises that, in addition to specialised breeds, some farming systems also discourage the dehorning of cattle.

Recommendation 118:
Slaughterhouse operators must ensure that cattle are not allowed to enter the handling system unless staff are ready to stun and slaughter immediately.

Response: Accept: It is the responsibility of the management of the slaughterhouse, and in particular of the lairage, to ensure that the animals are not held in the handling system if staff are not ready to stun and slaughter. Good design of the lairage will help to reduce problems. Instructions will be issued to OVSs to remind operators that animals should not be placed in the handling system until the slaughter team is ready to stun and slaughter.

Recommendation 119:
Guidance should be given in the design resource to be established by Government and the industry on the design of stunning boxes.

Response: Partially accept. The Government cannot commit to funding the establishment and maintenance of a design resource facility. It will, however,
investigate the availability of data on the design of stunning boxes and provide information to operators on best practice.

**Recommendation 120:**
All stunning boxes should have a level floor; all new installations with immediate effect and all boxes by 2008.

Response: Do not accept. There is disagreement over the benefits of stunning boxes with level floors. Although some animals may be reluctant to enter a stunning box with stepped or angled floor, other problems arise with stunning boxes with level floors. If the animal drops without rolling, its removal from the box may result in the stun to stick time being extended, with the danger that the animal may begin recovering consciousness before dying from exsanguination. There are also health and safety issues for the slaughterman who may be placed in danger if rhythmic kicking commences before the animal is removed from the box.

**Recommendation 121:**
Legislation that requires stunning boxes to be fitted with some device that restricts the movement of the animal’s head must be enforced by the MHS.

Response: Accept.

**Recommendation 126:**
Government should include criteria for the design and operation of group stunning pens for pigs in its code of practice.

Response: Accept. The Government will investigate the availability of data on the design and operation of group stunning pens and make recommendations in a Code of Practice.

**Recommendation 127:**
Government should fund research to evaluate optimum criteria for design of group stunning pens for sheep, calves and goats.

Response: Accept. However, any research will need to be accommodated within Defra’s research programme and available budget.

**Recommendation 133:**
The use of goads should not be considered a routine requirement of any pre-slaughter handling system.

Response: Accept.

**Recommendation 134:**
Animals must never be left waiting in restrainers. In the event of a breakdown they should be able to be evacuated or killed in situ.
Response: Partially accept. Animals should not be left for extended times in restrainers and it should be possible to evacuate animals or kill them in situ. However, it is not always possible to determine at the time of the initial breakdown how long the animals will have to remain in the restrainer before the system is again operational. For relatively short breakdowns it may be less stressful for the animal to be left in the restrainer than removed if this involves considerable handling. OVSs will be instructed to monitor animals in the case of a breakdown and instruct the operator to either remove or kill the animals in situ if they are showing signs of stress.

**Recommendation 138:**
The design resource to be established by Government and the industry should include handling systems that allow groups of pigs to calmly enter gas killing systems.

Response: Do not accept. The Government cannot commit to funding the establishment and maintenance of a design resource facility. However, it will investigate available data on existing systems both in the UK and overseas with a view to identifying most appropriate handling systems and will issue guidance in a Code of Practice.

**Recommendation 139:**
Electric goads should not be used in any gas stunning/killing handling system.

Response: Partially accept. See response to recommendation 108 above. Quiet handling and well constructed and designed handling systems are essential and should obviate the need to use electric goads.

**Stunning and killing**

**Recommendation 143:**
Government should establish a mandatory system of approval for stunning/killing equipment to ensure suitability for the purpose intended.

Response: Do not accept. The Government will consult with industry on the feasibility of establishing a voluntary system of approval for stunning/killing equipment, along the lines of a quality 'kite-mark' which would provide data confirming that the equipment is suitable for the purpose intended. Any mandatory system would require EU approval as manufacturers in other EU member states could not be required to submit their equipment for mandatory testing without a EU wide requirement. Any attempt to impose unilateral requirements would almost certainly be challenged in the courts. However, when
the EU Directive on the welfare of animals at slaughter or killing (93/119/EC) is revised we will press the Commission to consider including a provision for a EU kite-mark on stunning/killing equipment. Of equal importance is the necessity that equipment is correctly set up and operated, and tested for efficacy according to the manufacturers’ instructions.

**Recommendation 146:**
The OVS should monitor the keeping of records of slaughter equipment maintenance.

Response: Accept. Instructions will be issued to OVSs.

**Recommendation 149:**
Monitoring by slaughterhouse operators of the stunning/killing procedure should be audited by the OVS.

Response: Accept. Instructions will be issued to OVSs.

**Recommendation 150:**
The use and continued development of devices to monitor stunning equipment should be pursued by Government and industry organisations.

Response: Accept. There is already a considerable range of monitoring equipment available on the market, although the uptake of such equipment has not been as great as expected, or as desired. The Government will discuss with industry and other interested parties where gaps in the market still exist with a view to commissioning further work on new equipment. However, it might be more profitable to devote the limited resources to encouraging the greater use of existing monitoring equipment.

**Recommendation 152:**
Whenever the slaughterhouse is operating, the OVS should rigorously enforce the requirement that back-up stunning or killing equipment must be ready for use at the point of stunning or killing.

Response: Accept. The MHS enforce this provision and will remind staff of their duties in this respect. Guidance will be issued on how frequently such checks should be made.

**Recommendation 153:**
In larger premises, where the lairage is separated from the slaughter line, slaughterhouse operators should ensure that back-up killing equipment is kept in the lairage area to deal quickly with animals in pain or suffering.

Response: Accept. It is the operator’s responsibility to ensure that there is equipment available in the lairage to deal with animals experiencing avoidable
pain and suffering as a result of, for example, injury sustained during transport or in the lairage. If processing the animal through the normal stun/kill system would result in unnecessary pain for the animal it should be killed in the lairage. The OVS will be reminded to check on a regular basis that the necessary equipment is available and in good working order. Operators will also be reminded to provide lairage staff with the necessary training in handling injured animals to ensure their safety.

Recommendation 160:
Government and the industry should fund research and development into the use of non-aversive gas mixtures. The use of aversive gas mixtures should be phased out within five years.

Response: Partially accept. Research work has already been carried out in the investigation of non-aversive gas mixtures and further work is about to be commissioned. In particular, the use of argon has been studied. However, there are issues related to the length of time it takes for the animal to lose consciousness and die from anoxia when argon is used compared to the use of CO₂. There is also the issue of the increased cost of using argon. Work is underway to assess the use of nitrogen and nitrogen/argon or nitrogen/CO₂ mixtures. However, there are questions of containment with nitrogen mixtures, and existing equipment will probably require modifications before such mixtures can be used commercially. The Government cannot make any commitment to phase out the use of CO₂ within five years when there is no certainty that an effective alternative system will be available within that time frame.

Recommendation 167:
Tong positioning and effectiveness of stun should be monitored by the OVS and slaughterhouse managers with action being taken if performance falls below acceptable levels.

Response: Accept. However, the OVS carries out this work as part of routine daily duties as required by the MHS Operations Manual.

Recommendation 170:
Government should produce clear species-specific guidance on currents and application times for electrical stunning.

Response: Accept. The Government will investigate the availability of data on currents and application times for all species stunned electrically. Where there are robust data it will be included in the Code of Practice.

Recommendation 177:
Electrical stunning/killing systems for cattle must be closely monitored and maintained by the slaughterhouse operator to ensure effective stunning/killing.
Response: Accept. The OVS will be reminded of the need to ensure that the operator monitors the system closely and that a regular maintenance programme is followed and recorded. This is understood already to be carried out to some extent by those slaughterhouses operating electrical stun/kill systems for cattle, in order to ensure efficient usage. We are not aware of any animal welfare problems associated with the use of this equipment, but the OVS will be asked to check a sample of cattle to establish whether any exhibit a regular heartbeat after being removed from the box.

**Recommendation 178:**
Government should produce guidance for slaughterhouse operators on recognising an effective stun/kill when using electrical equipment on cattle.

Response: Accept. The Government will investigate with the equipment manufacturers, other experts in the field, and slaughterhouse operators, ways of recognising an effective stun, and publish guidance for slaughterhouse employees.

**Slaughter**

**Recommendation 189:**
Government should arrange re-evaluation of all restraining pens currently in use, particularly in terms of the efficiency of restraint of animals of various sizes.

Response: Accept. The Government will consider contracting an independent expert to re-evaluate the restraining pens used for slaughter without prior stunning.

**Recommendation 192:**
The legislation prohibiting the lifting of sheep by the fleece should be enforced by the OVS.

Response: Accept. However, we are not aware that currently this is a major problem in slaughterhouses where sheep are slaughtered without prior stunning. The OVS is not present all the time in the lairage and can only enforce in a fair and proportionate manner when contraventions are observed. The Operator should be able to demonstrate that all staff are trained in the correct handling of animals in the lairage.

**Recommendation 193:**
Alternatives to manual restraint methods for sheep should be explored by the industry for use at slaughter without pre-stunning.
Response: Accept. We will explore with the industry and interested parties possible alternatives to manual restraint.

Recommendation 197:
Where an animal has not been stunned, the OVS must ensure that nothing is inserted into the neck wound post-cut.

Response: Do not accept. The Government is committed to respect for the rights of religious groups, and in view of the assertion by Shechita UK that the insertion of the slaughterman's hand into the wound to check that all the vital structures have been cut cleanly is an essential part of shechita slaughter, we will not be legislating against it.

We accept that such action will stimulate nociceptive pathways and in a conscious animal may lead to a perception of pain. However the length of time for an animal to lose consciousness after the neck cut is disputed. We will continue to explore with the religious authorities whether, following the cut, there could be a greater delay before this inspection is carried out.

Recommendation 201:
Council considers that slaughter without pre-stunning is unacceptable and that the Government should repeal the current exemption.

Response: Do not accept. The Government does not intend to ban the slaughter of animals without prior stunning by religious groups.

We agree with FAWC that the scientific evidence indicates that animals that receive an effective pre-cut stun do not experience pain at the time of slaughter. The balance of current scientific evidence also suggests that those cattle which receive an immediate post-cut stun are likely to suffer less than those that do not. However we recognise that this latter conclusion is disputed.

The Government is committed to respect for the rights of religious groups and accepts that an insistence on a pre-cut or immediate post-cut stun would not be compatible with the requirements of religious slaughter by Jewish and Muslim groups.

However, others, particularly consumer and welfare groups, oppose slaughter without prior stunning and do not wish to eat meat that has not been stunned prior to slaughter. Meat from these animals can find its way onto the ordinary meat market but is not identifiable by consumers at the point of sale. As part of the wider process of review and consultation on labeling meat, the Government will work with consumer and industry groups to consider whether this problem can be addressed through a voluntary system of labelling, bearing in mind that
an early EU agreement on meat labelling according to slaughter method is unlikely.

**Recommendation 203:**
Until the current exemption which permits slaughter without pre-stunning is repealed, Council recommends that any animal not stunned before slaughter should receive an immediate post-cut stun.

Response: Partially accept. The Government does not intend to make it a compulsory requirement for animals to receive an immediate post-cut stun.

The Government considers that the current balance of scientific evidence suggests that cattle which have not received a pre-cut stun would benefit from an immediate post-cut stun. However, we recognise that this conclusion is disputed.

The Government is committed to respect for the rights of religious groups and accepts that a compulsory immediate post-cut stun on cattle would not be compatible with the requirements of religious slaughter by Jewish and Muslim groups. We will continue to discuss with the religious authorities the extent to which a voluntary immediate post-cut stun might be introduced in a manner that is compatible with their beliefs.

**Recommendation 210:**
The law should be changed to permit the bleeding of pigs and sheep within sight of their con-specifics in England and Wales, provided that a maximum stun to bleed time of 15 seconds is set down in legislation.

Response: Partially accept. In England and Scotland, the Government now permits the bleeding of sheep and pigs within sight of animals of the same species, but will not make it a requirement that the maximum stun to bleed time is 15 seconds. Current legislation (WASK) already states that an animal may not be stunned unless it can be bled without delay, and horned sheep and goats which are shot in the back of the head must be bled within 15 seconds. It is already a requirement of WASK that the stunning process must produce an immediate loss of consciousness, which lasts until death. However, guidance will be provided in the Code of Practice on recommended stun to stick times. Sticking within sight of other animals of the same species will not be a requirement; the decision will be at the discretion of the slaughterhouse operator. If for religious reasons animals may not be stuck within sight of another animal, operators may continue to follow current procedures.

**Recommendation 211:**
Government’s code of practice should set out targets for stun to bleed times for all species and for the range of stunning and killing methods currently in use.
Responses: Accept. The Government will investigate the availability of data on optimum stun to stick times and publish targets in a Code of Practice.

Recommendation 213:  
The law should require that bleeding should be carried out by severing both carotid arteries.

Response: Partially accept. With regard to animal welfare cutting both carotids is to be encouraged. However, a decision on this recommendation will be delayed until we have evaluated and consulted on the effect of the new EU Food Hygiene Regulations that come into effect from 1 January 2006. These include a requirement that for red meat species the oesophagus must not be cut during sticking. However, for those animal species where it is appropriate, it is recommended that a chest stick be used. This will cut the blood supply to both carotid arteries. The new EU Food Hygiene Regulations will exempt animals being slaughtered by a religious method from the ban on the cutting of the oesophagus.

Recommendation 214:  
The Government code of practice should recommend that thoracic bleeding methods should be used wherever practicable.

Response: Accept. The Code of Practice will recommend the thoracic cut where practicable.

Recommendation 217:  
Practical information on recognising the signs of unconsciousness in animals needs to be included in the code of practice and as a separate short checklist for slaughter staff.

Response: Accept. Information on recognising an effective stun will be included in the Code of Practice.

Recommendation 220:  
Government should revisit FAWC’s report “Foot and Mouth Disease 2001: Lessons for the Future” and address our outstanding recommendations, particularly with reference to killing techniques and equipment, and the licensing of field killing teams.

Response: Accept. (See Annex 1)

Recommendation 239:  
Government should provide guidance on the killing of deer in the field.
Response: Accept. The Government will consult with the relevant bodies on the killing of deer in the field and provide guidance to those keeping farm or park deer.

Recommendation 240:
Facilities used for lairaging and restraining deer, wherever they are killed, should be specifically designed for the purpose.

Response: Partially accept. In a purpose built deer slaughterhouse we would expect the facilities used for lairaging and restraining deer to be specifically designed. However, given the limited availability of purpose built facilities, there will continue to be a need for some deer to be slaughtered in conventional slaughterhouses. We would expect those slaughterhouses dealing with significant numbers of deer to install specifically designed lairaging and restraining facilities. However, for those slaughterhouses which deal with relatively small numbers of animals, any requirement for them to install purpose built facilities may not be financially viable, resulting in them ceasing to slaughter deer. This could adversely affect the welfare of the deer if, as a result, they undergo lengthy transport to slaughter.

Recommendation 241:
Deer should be stunned within a drop-floor crate to enable them to be firmly but calmly restrained.

Response: Partially accept. When deer are slaughtered in a purpose built deer slaughterhouse a drop-floor crate should be used. However, given the constraints on access to purpose built facilities it will not always be possible for deer to be stunned in a drop-floor crate.

Recommendation 242:
The welfare legislation should, where necessary, protect deer by referring to their specific needs.

Response: Accept. Consideration will be given to defining the specific needs of farmed deer and amending the legislation if necessary.

Recommendation 249:
Welfare at slaughter legislation must be changed to ensure ratites are treated as red meat animals and, if necessary, as a distinct category of animal.

Response: The Government will seek further advice on this recommendation. Ratites should clearly not be considered as poultry under WASK, and it is very unlikely that anyone farming/slaughtering ratites would in fact attempt to handle them in the same way as poultry. The solution may be to treat ratites as a
distinct category under WASK with specific requirements for lairaging, handling, restraining and slaughtering them.

**Recommendation 250:**
Ratites must be individually restrained for slaughter in a system designed to minimise stress.

Response: Accept. The Government will investigate designs for restrainers used in the UK and overseas. The Government will recommend designs that minimise stress for the animal.

**Recommendation 251:**
Government should identify best practice for the slaughter and emergency killing of ratites in a code of practice.

Response: Accept. The Government will investigate the most appropriate method for killing ratites in an emergency, to prevent the animal experiencing avoidable pain and suffering.

**Recommendation 258:**
Unloading and lairage facilities must be such as to ensure that wild boar cannot escape from the abattoir.

Response: Accept. The Government will seek advice on appropriate unloading and lairage facilities for wild boar and other difficult to handle species. Recommendations on the design of such facilities will be included in a Code of Practice (see below).

**Recommendation 259:**
Government should produce a Code of Practice for the slaughter of wild boar and other exotic species.

Response: Accept. The Government will produce a Code of Practice for the slaughter of exotic species raised in the UK.

**Recommendation 267:**
Government should fund research into the welfare implications of difficult-to-handle horses being accompanied by another, calmer horse during slaughter.

Response: Do not accept. There is already sufficient evidence that hard to handle horses react better when accompanied into the slaughterhouse by another calmer horse. However, the Government will be commissioning research into the slaughtering of horses within sight of others. If this does not cause the animal unnecessary stress, WASK will be amended to allow the slaughter of horses within sight others.
Recommendation 268:
If a stunning method were to be used during the slaughter of horses then Government should provide guidance on maximum stun to stick time.

Response: Accept. Should slaughterhouses currently dealing with horses choose to use captive bolt stunning rather than killing with the use of a free bullet, the Government would investigate appropriate stun to stick times and provide guidance.

Licensing, training and staffing

Recommendation 274:
A licence to slaughter should be granted by the MHS only to those who achieve an independently assessed and verified level of competence.

Response: Do not accept. A licence is granted only when an OVS is satisfied that the slaughterman has suitable experience and has achieved the required level of competence and knowledge required by the Regulations. Provision of detailed guidance for theoretical and practical training, including a range of questions to be answered at testing and assessment, would improve the consistency of approach by OVSs. The important factor is that detailed guidance for theoretical and practical training, supported by a pool of questions, is provided to ensure that the training and knowledge is sufficiently thorough and addresses the scope of knowledge required. It will also help OVSs in their assessments, as they will have a clearer idea of the competencies and knowledge base required before a licence is granted. The Government will be investigating how best to provide the necessary guidance.

The State Veterinary Service (SVS) and authorised veterinary surgeons assess and provide certificates of competence to slaughterers outside of licensed premises, although the licence is issued by the MHS.

Recommendation 275:
The competence of those holding licences to slaughter should be reassessed by the MHS every three years. If a licence is not renewed then there should be an automatic downgrading to provisional status.

Response: Partially accept. The MHS has more than 7,300 slaughterers on its database. There is continuous assessment by the OVS of the competence of licence holders working in licensed slaughterhouses. Any licence holder not complying with the requirements of his/her licence would be recommended for licence revocation and/or prosecution. However, the Government will consider introducing a requirement that slaughter licences be renewed every 5 years.
following a formal assessment. Such a requirement will have obvious cost implications for the industry and for individual slaughterers, and the Government will need to consult with stakeholders before introducing such a requirement.

**Recommendation 278:**
**Government should review the current slaughter licensing system and appropriate qualification and assessment systems should be developed for farmers, stockmen, slaughterhouse workers and field professionals.**

Response: Do not accept. The Government will consider the training requirements of those engaged in handling animals outside of slaughterhouses in the context of the possible training requirements for animal keepers, as outlined in the Animal Health and Welfare Strategy.

**Recommendation 282:**
**All slaughterhouses should have an appropriate training regime for all staff to ensure adequate levels of competence. Individual training records should be kept.**

Response: Accept. Slaughterhouse operators are encouraged either to establish internal training programmes for staff on animal welfare responsibilities, or to send staff on external training courses. It would be expected that operators would keep individual training records as a matter of course, but they will be reminded that best practice requires the maintenance of up-to-date training records.

**Recommendation 283:**
**Animal welfare at slaughter must form an integral part of the training of any individual working with live animals in the slaughterhouse**

Response: Accept. It is the responsibility of operators to ensure that all staff involved in the handling of live animals are aware of their responsibility to ensure that animal welfare standards are maintained at every stage of the slaughter process.

**Recommendation 285:**
**The OVS must ensure that the welfare of the animals being slaughtered is not compromised by operator fatigue.**

Response: Partially accept. Operators should ensure that all employees have sufficient breaks to prevent fatigue. The OVS will take action when the welfare of the animal is compromised by any failure on the part of the slaughterer.

**Recommendation 286:**
**Rotation of staff in large throughput operations should be a standard operating procedure. However, slaughterhouse operators must ensure**
that rotation of staff is practised only if the personnel involved are competent in all of the relevant tasks.

Response: Accept. Most large throughput slaughterhouses already rotate their staff as a matter of course. Those operators who do not, will be advised to consider introducing such a system. WASK requires that all persons engaged in the restraint, stunning, slaughter, killing, pithing, shackling or hoisting and bleeding of any animal have the appropriate licence attesting to their competence.

**Recommendation 289:**
The role of the AWO should be formalised in legislation and guidance as to their responsibilities should be outlined in the relevant Government code of practice.

Response: Do not accept. The Government welcomes the role played by the Animal Welfare Officer (AWO) in slaughterhouses and we can see merit in including guidance in a future Code of Practice. We will give further consideration to introducing legislation to formalise the role of the AWO, but currently are unconvinced that the benefits outweigh the regulatory costs.

**Recommendation 290:**
The AWO course operators should consider developing a system for formal assessment.

Response: Accept. This is a decision for the course operators but we believe it would be valuable. However, the varying educational backgrounds of the course participants will need to be taken into account in developing any possible system for formal assessment. The current lack of a formal assessment system should not be taken to imply that participants of previous courses have not gained very valuable training and knowledge from attending the course.

**Recommendation 291:**
Assistance should be given by Government to ensure that small to medium sized enterprises have access to AWO training.

Response: Do not accept. The Government encourages all operators to ensure that their staff undergo appropriate training, either in house or by attending an appropriate external training course. It is the operators’ responsibility to ensure that all staff involved in the handling of live animals are aware of their responsibility to ensure that animal welfare standards are maintained at every stage of the slaughter process. Operators are encouraged to develop a company welfare policy to make employees aware of animal welfare issues. The Government does not at present intend to make specific funds available for the training of AWOs in medium and small slaughterhouses, but will investigate the possibility of existing training funds being used to partially finance such training.
Legislation and enforcement

Recommendation 294:
Where legislation is being introduced affecting farm animals at slaughter but which is not directly related to animal welfare, e.g. for food hygiene, disease control or traceability purposes, the Government Department involved should carry out an animal welfare impact assessment as part of the consultation process.

Response: Accept. The Government does ensure that animal welfare is taken into account when legislation that might impact upon it is being considered. However, the Government does not propose to introduce a formal animal welfare impact assessment as part of the consultation process.

Recommendation 297:
Government should introduce a system of formal improvement notices for structures, equipment or practices that do not comply with the law and have the potential to cause animal welfare problems.

Response: Accept. The Government will investigate the practicality of introducing such a system in slaughterhouses.

Recommendation 301:
Attendance on animal welfare modules should be a required element of Continuing Professional Development for MHS staff.

Response: Partially accept. Contractors supplying OVSs to the MHS are required to identify and maintain a training plan for their OVSs according to their knowledge, experience and needs. The official duties of most Meat Hygiene Inspectors (MHIs) do not include animal welfare. However, in addition to the basic animal welfare training that MHIs receive prior to qualification, the MHS makes available to all MHIs a continuing professional development module on animal welfare. Regular attendance at training courses could create significant operational difficulties and have major financial implications.

Recommendation 303:
Government and the MHS should consider the use of auxiliaries, specifically trained and under veterinary supervision, to undertake some of the welfare monitoring currently carried out by the OVS.

Response: Accept in principle. The MHS supports the recommendation to have trained auxiliaries working under veterinary supervision to assist the OVS with welfare monitoring. Funding for training and development would have to be agreed.
Research, development and technology transfer

Recommendation 308:
The results of research into welfare at slaughter must be disseminated as quickly and as widely as possible, with the mechanism for technology transfer being clearly set out when the contract is awarded.

Response: Accept. All new contracts for Research and Development commissioned by Defra require that the contractors specify in their research proposals how the results will be disseminated. Assessment of proposals will take into account whether the technology transfer proposed is likely to be effective and adequate.
ANNEX 1

FAWC Report ‘Foot and Mouth Disease 2001: Lessons for the Future’

Recommendation 10: Detailed strategies for killing in the field of all species and ages should be available as part of contingency plans. These strategies should be based on sound scientific research.

Response: The recently produced training package “Getting it right ….first time, every time” (video, interactive CD ROM, and booklet) deals with the issues relating to the large-scale killing of animals of various species and ages in the field. The training package will be available as part of the contingency plan.

Recommendation 11: Field slaughtermen should be issued with an Army style “green card” setting out the minimum standards required of them.

Response: Chapter 3 of the SVS manual provides specific guidance for slaughter teams and animal handling teams in the case of a major animal disease outbreak. One of the responsibilities of the supervising vet/Case Officer is to ensure that all members of the Field Operations Team are provided with copies of this guidance. We believe that this will provide more comprehensive guidance than a “green card” system and can be easily amended to reflect changes in best practice.

Recommendation 12: Research is needed to assess the effectiveness of captive bolt stunners as killing method for sheep.

Response: We are considering commissioning research to assess the effectiveness of captive bolt stunners as a killing method for sheep.

Recommendation 13: Government should consider the establishment of a scheme of recognised standards for slaughter/killing equipment.

Response: See the response to Recommendation 143

Recommendation 14: Government should consider the establishment of a trained reserve of field slaughtermen for rapid deployment in disease emergencies.

and:

Recommendation 15: There should be a specific licence for field killing and incentives for slaughtermen to be trained and take up this option. Slaughter teams should not be paid piece rates.
Response: The Government has placed contracts with a number of licensed slaughtermen to provide slaughter services at 24 hours notice in the case of an animal disease emergency. Most of these slaughtermen have been sourced through the Animal Health Divisional and Area Offices and are known to the SVS staff. Before signing a contract they are required to provide a copy of their slaughter licence, a copy of their firearms certificate permitting them to kill animals (if they have one) and their insurance details. They will also be required to complete a field check before they can start slaughtering. In the event of their services being called upon slaughtermen will be paid a combination of a flat hourly rate and a headage payment. This is considered to be the most effective way of ensuring the welfare of the animal is protected while maintaining a satisfactory kill rate.

**Recommendation 16: The organisational principles of large scale killing under field conditions need defining and setting out clearly to provide operational guidelines for those having to set up and implement procedures on farms having widely different facilities.**

Response: The recently produced training package “Getting it right ….first time, every time” has been widely distributed in this country and abroad. Organisational principles for emergency large-scale killing on farm are also dealt with extensively in the SVS manual, Chapter 3. However, as all premises will differ it is not possible to provide exhaustive procedures for each holding. General principles are laid down and then it is the responsibility of the supervising Veterinary Officer/Case Officer to implement the procedures, taking into account the specific conditions on a particular holding and by seeking advice from others, e.g. owner of stock, slaughtermen etc.