Farm Animal Welfare Council

REPORT ON THE WELFARE OF FARMD DEER
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ON THE WELFARE OF FARMED DEER

Booklet 2498

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To:

The Rt. Hon. Michael Jopling MP
Minister of Agriculture, Fisheries and Food

The Rt. Hon. George Younger TD MP
Secretary of State for Scotland

The Rt. Hon. Nicholas Edwards MP
Secretary of State for Wales

I have pleasure in submitting the Farm Animal Welfare Council’s Report on the Welfare of Farmed Deer.

The Council decided in 1982 to proceed with a review on this subject at a time when it was clear that deer farming had become established as a farming enterprise and interest and participation was continuing to grow. Furthermore the Council had had previous involvement in the subject with their consideration in 1980 of the welfare implications of the harvesting of deer antlers in velvet. We were also aware of increasing concern that special consideration needed to be given to the welfare of farmed deer because they were of a flighty nature and traditionally were accustomed to more freedom than a farm situation allowed. For these reasons we felt that a review would be appropriate covering all aspects of deer farming including transportation and slaughter and, furthermore, consideration of deer kept in parks as well as on farms.

Our review was undertaken by a small working group of Council members and it is the findings and recommendations of that Group, recently endorsed by the Council, which form the basis of our Report. Four of our Council Members felt unable to accept some of the findings and recommendations on the slaughter of deer and the extent of their disagreement is recorded in a Dissenting Note at the conclusion of the Report.

Our recommendations include proposals for changes in legislation as well as a draft Code of Practice. In many instances our recommendations result from omissions in current legislation, much of which was introduced before the emergence of farmed deer and did not therefore take them into account. We believe that our proposals, if implemented, will provide sensible safeguards for the special needs of deer without imposing unreasonable constraints on those who farm deer, most of whom we believe are concerned with the welfare of their stock and with proper animal husbandry.

I very much hope that you will be able to proceed with consideration of our proposals and such consultations as you consider necessary as quickly as possible and that this will lead to early legislative or other changes which we believe to be in the interests of all.

Professor Sir Richard Harrison
Chairman – Farm Animal Welfare Council
INTRODUCTION

1. The Council's involvement with the welfare of deer began in 1980 with the publication of their report (the Council's first publication) on the animal welfare implications of the harvesting of deer antlers in velvet. Their recommendation that the practice should be prohibited was accepted by Agriculture Ministers and legislation subsequently introduced which imposed a ban. At that time deer farming was reported to be in its infancy with only some 14 deer farms known to be in existence. Since then the number of farms has grown to well over 100 with an estimated 5000 deer, although this excludes most park deer. Deer farming therefore remains a small part of the livestock industry but nevertheless has become firmly established and recognised as a farming enterprise. Because of the decline in some animal production systems, e.g. in the dairying sector, it is possible that the expansion of deer farming may continue, particularly if marketing of venison and its by-products becomes further organised and outlets developed.

2. For some time the Council had intended preparing a welfare code for farmed deer once it had completed the task set by Ministers of revising or drafting welfare codes for the main farm species. The trigger which finally set the Council on its course for a general review of the welfare of farmed deer, i.e. a wider remit than simply drafting a welfare code, was the emergence in 1982 of proposals for amending legislation in Scotland to permit deer farmers to slaughter their deer during the close season (see para 30). At that time the Council recorded their concern that legislative action was being taken in advance of their consideration of the subject and undertook to proceed immediately with a review in relation to the farming, transport and slaughter of farmed deer which would consider not only proposals for a code but also relevant legislation, much of which had been drafted before the emergence of farmed deer enterprises and did not take account of their existence.

3. To carry out this review the Council set up a small working Group of members (see Appendix A) whose first task was to publicise its proposed review by the issue of a Press Statement and to invite submissions from interested organisations and individuals. Many issues were raised in the submissions which were received and a wide range of views expressed — all of which have been considered by the Group. The organisations and individuals who have contributed written or oral evidence are shown at Appendix B.
4. The Group subsequently took oral evidence from the British Deer Farmers Association, the British Deer Society and the Red Deer Commission; these and other organisations have since been further consulted for specific technical advice on aspects of the review. Members of the Group have also undertaken fact-finding visits to deer farms and parks in England and Scotland, have observed deer slaughter (both on the farm and in a slaughterhouse) and have attended deer auctions. We are very grateful to all who assisted the Group with its work, particularly those who allowed us to visit and observe their enterprises and made us welcome. It was evident that all with whom we had contact were concerned to ensure that we should have every opportunity to gather whatever information we needed.

DEER FARMING

5. The farming of deer, as opposed to the keeping of deer for purely amenity and sporting purposes, did not develop in this country until the early 1970s, although deer farming had existed in New Zealand for some years. Commencing in 1970, research work undertaken jointly by the Hill Farming Research Organisation at Glensaugh and the Rowett Research Institute at Aberdeen and subsequent development work by ADAS at Stoneleigh showed that red deer could be managed and handled in a farm situation and, with improved feeding and management, a saleable carcase could be produced. Slaughter age is known to range from 6 to 24 months, with the majority of deer being slaughtered at 16 to 18 months. Most of the deer farmed are red deer and to a lesser degree other species such as fallow, roe, sika and wapiti.

6. The primary purpose of a deer farm is to produce venison for sale either at the farm gate or, as is becoming more common, through retail outlets. The supply of foundation stock for other deer farms is also an important part of some enterprises and income is also derived from the sale of deer by-products, such as skins and antlers. Although deer farming as a specialist livestock enterprise has been developed primarily on farm land there is an increasing tendency for herds of park deer, which were originally established for amenity and sporting purposes, to be more directly managed for the production of venison with more involvement in the breeding, feeding and handling of these deer.

7. In the course of this review account has been taken of deer kept in parks as well as deer on farms and the use of the term 'farmed deer' in this report is therefore taken to cover both situations unless otherwise indicated.
8. It should be stressed that the Group's interest was restricted to welfare matters and it was not its purpose or concern either to encourage or discourage the development of deer farming as a livestock enterprise. Within the remit account obviously had to be taken not only of the existing husbandry practices but also likely trends for the future. With the demand for increased quantities of farm venison and the stipulation of conditions for hygiene control at slaughter, changes in the traditional practices of on farm slaughter by shooting had to be considered and future trends examined.

9. Although the development of deer farming has shown that deer, particularly red deer, can be 'domesticated' to an extent, it is important to stress that deer have different behavioural characteristics from other farmed animals such as cattle and sheep which have been selectively bred over many centuries. When accustomed to the sight and sound of man wild deer can be tamed to a considerable degree and hand-reared animals can become extremely tame but some may always remain highly-strung and nervous and can be easily excited or frightened. This is a factor which was of particular concern to the Group and many of their recommendations take account of these special circumstances which are not common to other farm animals.

10. In the course of our review we have been impressed with the responsible attitude to welfare taken by those in the industry with whom we have had contact. Most deer farmers are, we understand, members of the British Deer Farmers Association and some are also members of the British Deer Society which has long been associated with those landowners who maintain herds of deer on their estates or parkland. Both organisations have provided us with much constructive advice and are evidently concerned to ensure that fuller account is taken of welfare in the development of farmed deer enterprises. The British Deer Farmers Association has for some years produced its own 'Guidelines for Deer Farmers' which places stress on the special welfare needs of the deer.

**LEGISLATION**

11. Much of the existing legislation relating to deer was not drafted with farmed deer in mind, nevertheless it can have a considerable bearing on such enterprises. Deer farmers are, therefore, already subject to more legal constraints than other livestock enterprises.

12. Legislation which has a bearing on the welfare of farmed deer and which we have taken into account in the course of our review is summarised below. More detail on specific aspects of this legislation will be found under each of the relevant subjects considered later in this report.
Part I provides that any person causing unnecessary pain or unnecessary distress to livestock situated on agricultural land shall be guilty of an offence; it also enables Ministers to make Regulations with respect to the welfare of livestock and to prepare welfare codes.

These prohibit acts likely to cause damage or inflict unnecessary suffering to any captive or domestic animals.

Contain provisions which control the taking and killing of deer including the methods used and provisions for close seasons. The Scottish Act also constituted the Red Deer Commission.

These Orders contain general measures intended to safeguard the welfare of animals, including deer, during their carriage by sea, air, road and rail.

These prohibit the removal of deer antlers in velvet.

Includes controls on the supply and administration of prescription only medicines such as immobilising drugs.

Includes restrictions on the possession and handling of firearms and ammunition, including such weapons as immobilising dart guns.
The Slaughterhouses Act 1974/
The Slaughter of Animals
(Scotland) Act 1980 and
associated regulations

Contain provisions for the licensing/registration of slaughterhouses, the lairing, stunning of animals for slaughter, the licensing of slaughtermen and regulations for humane slaughter practices. At present the requirement for licensing of slaughterhouses in England and Wales is the only provision in all this legislation which applies to deer.

CODES OF RECOMMENDATIONS FOR THE WELFARE OF FARMED DEER

13. The Group's first task was the drafting of a welfare code. With the exception of the sections relating to transport and slaughter off the farm (see para 16) this code is intended to be on the same basis as those already existing for other farm species, such as cattle, sheep and pigs, which are issued under the provisions of Section 3 of the Agriculture (Miscellaneous Provisions) Act 1968. This means that the code provisions are not mandatory in themselves but where a person is charged under the Act with causing unnecessary pain or distress to livestock situated on the farm, a failure to comply with the provisions of the Code may be relied on by the prosecution as tending to establish guilt. The draft Code is reproduced at Appendix C. This will be subject to consultation with all interested persons before final decisions are taken by Ministers on its contents prior to presentation for Parliamentary approval and subsequent publication.

14. The Council is currently considering all the welfare codes, including the draft deer code, with a view to identifying which of the codes' provisions it proposes recommending as regulations with the direct force of law.

15. The draft deer code endeavours to provide welfare guidelines based on present knowledge and soundest current husbandry practices. It recognises the need for high standards of stockmanship and an understanding of the unique behavioural characteristics of deer as a species. The Preface comments that: 'Any farmer embarking on deer farming without acquiring some knowledge of the special characteristics and needs of these species does so at great risk to the welfare of deer'. In the code particular emphasis is placed on the handling of deer and the special requirements for accommodating them both in the field and when housed.
16. Also included in this code are sections on the transport of deer and on slaughter. Insofar as these activities take place off the farm the code provisions do not have the same statutory backing as those which relate to activities on the farm (the 1968 Act relates only to on-farm activities), but they should be considered as guidelines which are complementary to the separate legislation which presently applies to transit and to new legislation which is proposed later in this report for slaughter (paras 73-75).

17. It is intended that the deer to which the code will apply should be all deer kept on farms on in parks, i.e. all deer except feral deer. (See paras 19-25).

**DEFINITION OF FARMED DEER**

18. The Group recognised at an early stage in its work that there would be a need to establish which deer enterprises should be covered, not only by the codes but also by the various legislative provisions it was proposing. The term ‘farmed deer’ seems clear enough to the extent that most would assume it covered any deer kept on agricultural land as part of a livestock enterprise; the position of deer kept in other circumstances, e.g. in parks, is more complex.

**Definition for the purpose of The Agriculture (Miscellaneous Provisions) Act 1968**

19. The interpretation of ‘livestock’ within the context of the 1968 Act covers ‘any creature kept for the production of food, wool, skin or fur .....’, and the definition of ‘agricultural land’ includes ‘land used for ..... livestock breeding and keeping, the use of land as grazing land ..... etc’. There is then no doubt that deer being maintained for the production of venison, skins, etc., on grazing land come within the definition of livestock for the purposes of the 1968 Act (and therefore the code provisions). There is also no doubt, in the Group’s view, that feral deer running free on open land and in forests with no element of husbandry should not come within the definitions of farmed deer for the purposes of the code or relevant legislation. Likewise it is not the intention to cover deer kept in establishments which are subject to the requirements of the Zoo Licensing Act 1981.

20. There is less certainty when considering the extent to which ‘park’ deer can be included within a legal definition of ‘farmed deer’ – ‘park deer’ being taken as those kept within the boundaries of parkland on large estates or in
amenity and country parks. In such situations the primary purpose in keeping deer is usually aesthetic, amenity or sporting, even though the deer may be given supplementary feed and, in any event, are likely to be shot eventually for consumption as venison. There are also a growing number of estates where the deer, though kept originally for amenity and sporting purposes, are now being managed to the extent that there is some planning and control of breeding practices with stock being taken for slaughter at an earlier age.

21. Legal advice obtained for the Group was that deer kept on parkland might well come within the definition of 'livestock' for the purposes of the 1968 Act if they were eventually sold as venison but because they were not kept primarily for food production the situation was not entirely clear and only a Court could provide an absolute answer on this. It was not certain therefore whether the provisions of the proposed Code and the general welfare provisions of the 1968 Act gave park deer the protection which deer kept as a livestock enterprise on farms enjoyed.

22. The Group considered whether it should recommend that all park deer should be treated as 'farmed deer' for the purposes of the proposed code and the provisions of the 1968 Act. It recognised that some park herds were not managed to any extent and carefully considered whether the code provisions, in particular those relating to handling facilities, could be relevant in such circumstances. Members were made aware, however, in some of the written and oral submissions made to them of reports that insufficient care was taken of the welfare of some park deer, particularly in respect of inadequate feeding and inspection.

23. They concluded that all park deer should be given the protection of the welfare provisions of the 1968 Act so that it would be an offence for any person to cause them unnecessary pain or unnecessary distress. They also concluded that it would be prudent for all the proposed code provisions to apply to park deer.

24. The Group noted the definition of a deer farm as contained in the 1982 amendment to the Scottish Deer Acts (see para 30) but considered that this did not provide for the coverage of park deer to the extent proposed.

25. IT IS THEREFORE RECOMMENDED THAT THE AGRICULTURE (MISCELLANEOUS PROVISIONS) ACT 1968 SHOULD BE AMENDED SO THAT IT SPECIFICALLY COVERS ALL DEER (EXCEPT FERAL DEER) EVEN WHERE THE PRODUCTION OF FOOD, SKINS OR OTHER BY-PRODUCTS IS NOT A PRIMARY PURPOSE IN KEEPING SUCH DEER.
26. Definitions of ‘farmed deer’ for the purposes of close season exemptions and the proposed slaughter legislation are at paras 34 and 75(a).

Further consultation

27. The Group recognised that the drafting of the relevant definitions would be for Parliamentary draftsmen to undertake and that its recommendation should be restricted to a clear indication of what the definition should cover. Members nevertheless request that Agriculture Ministers should further consult with the Council when the proposed definitions have been drafted so that an opportunity is provided for further comment.

LICENSING OF DEER FARMS

28. The Group considered whether there should be a requirement for deer farms to be licensed. It concluded that potential welfare benefits attributable to such a requirement would be limited and the mechanics and parameters for operating such a procedure would be extremely difficult to establish and complicated to operate. A further relevant factor was that such a licensing requirement existed for no other livestock enterprise and a recommendation for such controls on the developing deer farming industry would need to be fully supported with evidence that there would be inadequate welfare protection without such controls. The Group was not satisfied that such evidence existed and also took into account their proposals for ensuring that the welfare provisions of the 1968 Act and the proposed code should apply to all farm and park deer. Members therefore considered there were insufficient grounds for proposing a licensing requirement for deer farms.

CLOSE SEASON EXEMPTIONS FOR FARMED DEER

29. The taking or killing of deer during close seasons is, with certain limited exceptions for marauding deer, prohibited by the various Deer Acts. There are substantial variations between the Scottish close seasons and those set for England and Wales which tend to be much shorter. For example the close seasons for Red Deer are:
With the growth of deer farming came a demand (particularly in Scotland with the longer close seasons) that deer farmers should not be subject to the close season constraints when culling their stock, bearing in mind that their livelihood depended on the ready availability of venison for sale and also that no other livestock enterprises were subject to the same constraints. A 1982 amendment to the Scottish Deer Act gave Scottish farmers specific exemption from the close season. The amendment, relating to Section 21 of The Deer (Scotland) Act 1959, reads as follows:

'This Section does not apply to the killing of deer by any person who keeps those deer by way of business on land enclosed by a deer-proof barrier for the production of meat or foodstuffs, or skins or other by-products, or as breeding stock (or to such killing of deer by the servant or agent of any such person authorised by him for that purpose); provided that the deer are conspicuously marked to demonstrate that they are so kept'. (Section 21 (5A)).

The Group considered not only whether the Scottish exemption was appropriate but also whether there should be a similar provision in England and Wales. The Scottish provision was not considered to be appropriate to adopt more generally because it was not clear that park deer would be covered and it did not therefore meet the criteria set for coverage of the welfare provisions of the 1968 Act (para 23).

On the general question of a close season exemption for killing farmed deer the Group concluded that an objection to this on welfare grounds could not be sustained. There was no evidence that farmed deer were subject to more suffering and/or stress if killing took place during the close season. There was however a need to ensure that only farmed deer, as defined in para 25, were exempted and that there should be no loop-hole to permit trophy killing on farms in the close season or the enticement of feral deer to farms for that purpose.

The Group concluded that there should be a requirement that deer, when slaughtered during the close season, should be ‘conspicuously marked’ to show that they belonged to the deer enterprise concerned; this would necessitate handling the deer to mark them and would be likely to deter other than those with genuine deer farming businesses.
34. The Group therefore RECOMMEND THAT A CLOSE SEASON EXEMPTION FOR THE KILLING OF DEER SHOULD BE EXTENDED TO ENGLAND AND WALES BUT PROPOSE THAT THE QUALIFYING STATUS (FOR SCOTLAND, ENGLAND AND WALES) SHOULD BE THOSE DEER FALLING WITHIN THE 1968 ACT PROVISIONS, AS PROPOSED FOR AMENDMENT BY THE COUNCIL (see para 25), PROVIDED THEY ARE CONSPICUOUSLY MARKED TO INDICATE OWNERSHIP BY THE FARM CONCERNED.

MARKING OF DEER

35. Apart from the requirements for the marking of deer to qualify for the close season exemption provisions there are no legal requirements, such as exist for some other farmed species, for deer to be marked, although most deer farmers do in fact mark their stock, usually for the purposes of identification and record keeping.

36. Deer are not subject to the record keeping requirements laid down for most farm species in The Movement of Animals (Records) Order, 1960, for the purposes of disease control although there are controls on the marketing of venison. On health grounds, which the Group considered appropriate to welfare, IT IS RECOMMENDED THAT DEER SHOULD BE BROUGHT WITHIN THE COVERAGE OF THE 1960 ORDER.

37. The Group concluded that on welfare grounds they could not justify a mandatory marking requirement, other than for the purposes of the proposals to permit slaughter in close seasons and in slaughterhouses, and felt that it should be left to the farmer’s discretion whether he marked his deer or not.

38. Ear tagging (either metal or plastic) was found by the Group to be the most commonly used system of marking. Some use is also made of expanding or rigid collars which are more conspicuous than ear tags. Freeze-branding has been tried but found unsatisfactory because it tends to disappear and tattooing is also unsatisfactory because of the background pigmentation on deer skin. Ear notches need to be large to avoid their growing over and therefore cause considerably more damage than tags and the Group is not in favour of this method for marking deer; in addition it is an ineffective system for long distance identification. The Red Deer Commission advised the Group of a project they had undertaken on calf marking and the conclusions that large plastic ear tags were the most acceptable.
RELAND DEER FOR SPORTING PURPOSES

39. A subject raised in some of the submissions made to the Group is that of the deliberate release (or sale for release) of farmed deer for sporting purposes. It was said that this could be a profitable way of disposing of old stags which have outlived their use on the farm and can result in their being transported long distances.

40. The Group concluded that they were strongly opposed to this practice, particularly where the intention was release for immediate sporting purposes. However account would have to be taken of the legitimate practice of introducing selected farm stock into herds of feral deer for genetic improvement which the Group concluded was a practice which it could not reasonably oppose. However, it was AGREED THAT THE GROUP’S CONCERN ABOUT THE RELEASE OF DEER FOR SPORTING PURPOSES SHOULD BE STATED AND A RECOMMENDATION MADE TO MINISTERS THAT CONSIDERATION BE GIVEN TO WAYS AND MEANS BY WHICH THE PRACTICE MIGHT BE PREVENTED.

TAKING DEER FROM THE WILD

41. Deer for farms are obtained from a variety of sources and in addition to purchases from existing farm or park herds includes the taking of live deer from the wild. This is done by catching the young calves by hand, taking older deer by netting or trapping or by enticing wild deer on to enclosed farmland. Representations have been made to the Group both on the grounds that legislation should be amended to permit the controlled extraction of calves from the wild during the close season and conversely that the practice is inhumane and should be subject to stricter control or prohibited.

42. Existing legislation varies considerably between England and Wales and Scotland. In Scotland feral deer can be taken live in the open season but in the close season only under licence and then for scientific and educational purposes only. In England and Wales the taking or enticement of any live deer by netting, trapping or sedation for the purpose of movement from one area to another or for scientific and educational purposes during both open and close seasons must be licensed by the Nature Conservancy Council (NCC). The taking of live calves by hand would not apparently be subject to these licensing requirements but would in any event be prohibited during the close season by the provisions of the 1963 Deer Act.
43. The Group carefully considered whether there were welfare problems associated with the taking of deer from the wild which would justify proposals for more stringent controls or even prohibition. It was not satisfied that sufficient evidence existed to support such a recommendation. It has to be acknowledged that it is obviously in the owner's interests for any deer taken for breeding stock to be well protected and cared for and the Group believe that this is generally the case.

44. If the Group's proposals (at para 25) are accepted and implemented any deer taken from the wild would, in any event, become subject to the protection of the legislation and the proposed code once they were held on a deer farm or park and there would thus be some safeguard against their neglect or ill-treatment. The draft code also contains specific guidelines (at paras 18 to 20 of Appendix C) for the care of deer taken from the wild.

45. The Scottish provisions, referred to at para 42, are reasonably straightforward and, in effect, prevent the taking of live feral deer for deer farms during the close season. The Group concluded that it would not want to see this position changed. With the increasing availability of breeding stock from established deer herds the grounds for claiming that deer farmers should be exempted from the close season limitations and able to acquire such a stock throughout the year are open to question.

46. The legislation in England and Wales is much more complex and it is clear that the licensing provisions which were originally intended to protect feral deer now impose restraints on the movement of farmed deer — a purpose which was evidently not envisaged when the requirements were introduced in the 1963 Act. The effect has been that any movement of farmed deer from one farm to another which involves trapping, netting or sedation requires an NCC licence and we understand that a high proportion of the licences issued are to authorise the movement of farmed deer rather than to protect the taking and movement of feral deer. The Group's view is that whilst the licensing requirements are appropriate to the taking and movement of feral deer there are no welfare grounds for such a requirement for the movement of farmed deer and THEY SHOULD BE EXEMPTED FROM THE LICENSING PROVISIONS OF SECTION 11 OF THE DEER ACT 1963. Existing protection for the taking of feral deer and limitations during the close season should remain.

TRANSPORT OF DEER

47. Reference has already been made at para 16 to the proposal to include guidelines on transport in the welfare code. These are contained at paras 54 to 67 of the draft code at Appendix C. The Group has also considered whether existing legislation needs strengthening.
48. Current protection for deer in transit exists principally under the terms of the Transit of Animals (General) Order 1973 which provides, inter alia, that ‘No person should carry any animal by sea, air, road or rail, or cause or permit any animal to be so carried, in a way which is likely to cause injury or unnecessary suffering to the said animals’. (Article 5(2)). This protection extends to loading and unloading. The Order also deals with the care of animals during transport including feeding and watering and includes measures to deal with unfit animals and animals likely to give birth. Further provisions relate to the protection of animals from various risks of injury or suffering arising from any cause including exposure to adverse weather conditions, inadequately constructed or insecure fittings and obstructions in vehicles.

49. From the enquiries made in the course of the review the loading and transportation of deer does not present the problems which might have been expected from the handling of such highly strung animals. The practical experience of those who had involvement with the movement of deer was that, providing suitable transport was used, deer could travel long distances without appearing to suffer any stress. It was also evident that batches of deer could be satisfactorily transported on short journeys in vehicles such as trailer-type horse boxes.

50. It will be seen from the proposed guidelines for the code that various safeguards are stressed including the importance of having an experienced handler to accompany the deer, the need for special care of a sedated animal and care in segregating groups to take account of such factors as social groupings, adult stags and stags in velvet. Space standards depend on the journey involved; for very short journeys, when it is not necessary for animals to be able to lie down, it is preferable to have a vehicle well loaded so as to discourage the animals from lying down and possibly being trampled on. For long journeys it is essential to provide sufficient space for the deer to lie down to rest during the journey and to be able to get up easily and to turn around. The code proposals also recognise the need for a darkened interior, a bedded floor and the requirement for adequate food and water, particularly to overcome the risk of dehydration. The Guidelines issued to deer farmers by the British Deer Farmers Association provide useful advice on the transport of deer.

51. The Group noted that because of differences in the relevant primary legislation there would be a difference in status between the respective sections of the proposed code on the husbandry of deer on the farm and on their handling in transit. The section covering on-farm activities would have the statutory backing of the 1968 Act (see paras 13 and 16) whereas the section on transit would not. It would simply have the status of detailed
official guidelines to supplement existing regulations mentioned at para 48 above, i.e.: in the same way as do the existing Codes of Practice on the transport of farm animals and horses by air and on roll-on/roll-off ferries.

52. The Group considered whether there was a need to recommend that the transit section of the code be given more formal status. They concluded that there was no evidence of welfare problems which would justify a recommendation for legislative change in this respect and that in general the approach of supplementing the existing transit regulations with the proposed code guidelines would suffice.

SLAUGHTER OF FARmed DEER

BACKGROUND

53. Total numbers of deer slaughtered are not recorded but the British Deer Farmers Association reported in 1983 that some 112 deer farms were producing around 3000 carcases annually. Traditionally deer have been killed by stalking and shooting, generally for sport but often with the added purpose of culling of the herd. As deer farming develops so will the necessity arise for regular, efficient and selective slaughter of stock as an essential part of the enterprise. The majority of farmed deer are still slaughtered by shooting in the field, a small proportion have been slaughtered in specially constructed farm abattoirs and some are known to have been taken to slaughterhouses for slaughter (see para 67).

54. The Group was aware from the outset that, of all the issues to be reviewed, this was probably the one which created most concern, particularly with those organisations representing welfare interests and especially in relation to the use of slaughterhouses. The Group has observed and fully considered the three environments for slaughter referred to in para 53; in addition it sought further written advice on specific aspects of slaughter, particularly on shooting in the field, from a number of interested organisations including welfare, veterinary and producer interests.

55. Although slaughter by shooting with a free bullet in the open currently predominates, it has become evident in the course of the review that the sale of farm venison is already expanding from traditional farm gate sales into wider retail outlets (including supermarket chains) and this extended market is resulting in a reassessment by deer farmers of their slaughter methods, particularly in terms of increasing the numbers of deer to be slaughtered at
any one time and in hygienic conditions to meet market requirements. Public safety, particularly in open parkland, is a further consideration. Thus an increasing interest in slaughtering deer in a similar way to other farm livestock by taking them in batches to licensed slaughterhouses is already apparent and cannot be ignored by the Group. (It should be stressed that hygiene considerations, although important, do not come within the Group's remit and are not therefore taken into account in the findings on deer slaughter).

LIMITATIONS OF EXISTING LEGISLATION ON SLAUGHTER

56. It is clear that current legislation on the slaughter of farm livestock was never designed with deer in mind. For field slaughter, there are strict requirements on the types of weapons that can be used and on licensing requirements for their use in the Deer Acts, related Orders and in the Firearms Act; however, these are directed as much towards human safety considerations as to the welfare of the deer. Deer at slaughter, whenever it occurs, would be subject to the general Protection of Animals legislation and deer slaughtered on the farm would be covered by the general welfare provisions of the 1968 Act (see para 12); however, there are at present no specific welfare provisions or codes of practice relating to actual slaughter practices for deer.

57. In England and Wales the legislation requiring slaughterhouses (other than those run by local authorities) to be licensed makes no distinction between species and there appears to be no bar to the slaughter of deer in slaughterhouses. However, the associated legislation which gives welfare protection in such premises to most farmed species does not apply to deer. In Scotland the situation is different in that the drafting of the relevant legislation has the effect of preventing any deer being taken into registered or local authority slaughterhouses.

FIELD SLAUGHTER

58. The Group recognised that shooting by free bullet in the field may well remain the most common form of slaughter for deer and CONCLUDED THAT GUIDELINES ON FIELD SLAUGHTER SHOULD BE INCLUDED IN THE PROPOSED WELFARE CODE to supplement the general protection which it is proposed that all farm and park deer should have under the provisions of the 1968 Act. The proposed guidelines are listed at para 64.
59. The Deer Acts and relevant Orders, which are the responsibility of the Home Office and the Secretary of State for Scotland, prescribe weapons and ammunition which can legally be used for killing deer. In evidence submitted to the Group weapons generally favoured are high velocity rifles but some use is evidently made of 12 bore shotguns with single lead shot for very close range shots. (Limitations on the use of shotguns and on the cartridge specification are prescribed in the legislation). The Group supports the use of high velocity rifles but does not recommend the use of shotguns.

60. Although many submissions commended field slaughter as the only acceptable method on welfare grounds, the Group was not entirely convinced that field slaughter was always as effective as claimed. There was no doubt that given the right conditions, (e.g. a clear, stationary target, expert marksmen, tame or semi-tame deer, an adequate total group and field size) deer can be efficiently slaughtered with little or no stress and this is probably the case with most field slaughter. Assessment of shooting efficiency made by interested organisations produced estimates ranging from 75 to 100 per cent accuracy in terms of killing outright with the first shot. It is evident that deer are not generally alarmed or stressed by the sight of their dead fellows or by the sight and smell of their blood. They are more likely to be startled, albeit momentarily, by the sound of a shot being fired. The Group have themselves seen a group of deer apparently contentedly carrying on feeding amongst deer already shot.

61. Without the ‘right conditions’ there is considerable scope for stress and suffering in the herd. The competence of the marksman is all important and although it has no first hand evidence, the Group is aware of reports of injury and suffering caused to deer by poor shooting. The Group considered whether it should recommend more stringent controls on the issue of firearms certificates, e.g. an assessment of the applicant’s ability to shoot for the purposes stated. Members concluded that they did not wish to recommend a specific licensing requirement for shooting deer because of wider implications for firearms control in other sectors BUT RECOMMEND THAT FURTHER CONSIDERATION SHOULD BE GIVEN TO THIS.

62. It is evident that advice and knowledge on the preferred conditions to be observed for shooting deer in the field are of paramount importance and the Group commends the training courses run by such organisations as the British Deer Society and the Agricultural Training Board.
DRAFT CODE GUIDELINES FOR FIELD SLAUGHTER

63. It is intended that the proposed code guidelines which follow would have the statutory backing of the 1968 Act (see para 13). Provided they are accepted by Agriculture Ministers and given Parliamentary approval, failure to abide by them could be used as evidence in any prosecution for causing any unnecessary pain and unnecessary distress to farmed deer.

Code Guidelines for Field Slaughter of Farmed Deer

64. (i) Humane slaughter of deer can be achieved by accurate shooting using a suitable rifle* and ammunition.

(ii) Where a rifle is used safety is of paramount importance and the marksman should be trained # and proficient in the use of firearms. Shooting at short range facilitates accuracy and safety.

(iii) A safe backstop for the bullet is needed and care must be taken in shooting one deer not to injure others. Shooting from an elevated position such as a high seat or trailer is often helpful in these respects.

(iv) Sensible precautions for public safety include: shooting in the early morning when few people are around; walking the perimeter fence of small farms or paddocks on large farms to ensure all is clear; shooting away from roads, houses and gardens.

(v) Where deer are so tame and quiet that they present a stationary target at close range (10 to 20m), a frontal head shot by an expert marksman is wholly effective. With semi-wild deer up to 40m range, a high neck shot (to break the spinal cord) is also suitable. For a more distant target up to 100m, a heart/lung shot is recommended. Shooting over 100m should be attempted only in exceptional circumstances and then only by proven marksmen.

*Firearms used to kill deer must comply with The Deer Act 1963 (England and Wales) or The Deer (Scotland) Act 1959, both as amended, and are subject to The Firearms Act 1968.

# The British Deer Society runs courses which include instructions for marksmen who wish to shoot deer.
Shooting should be undertaken, preferably by the regular stockman, when deer are quiet, as will occur at a selected regular feeding site when they are being hand fed. Under such circumstances it may be possible to shoot 10 or more deer from a large group before the remainder become unduly disturbed. Factors to take into account in assessing the effect shooting will have on the rest of the herd and deciding the number to shoot include: the size of the original group, stocking density and the amount of cover. Care should be taken not to leave too few since small numbers become unsettled and try to escape. There is also a risk of panic if too small a paddock is used.

**ABATTOIR SLAUGHTER**

65. Reference was made in paras 56 and 57 to (a) the complete absence of specific welfare legislation for deer in slaughterhouses and (b) the anomalous position which prevents the slaughter of deer in Scottish slaughterhouses but appears to permit it in England and Wales. Reference has also been made to the concern expressed in some submissions to the Group that deer should not be taken to slaughterhouses for slaughter.

66. The additional features of abattoir slaughter compared with field slaughter are that the deer have to be collected together for loading and transportation to slaughterhouses (and de-antlered if stags), unloaded and laired in the slaughterhouse lairage for a short period, marshalled into a stunning pen where they are restrained and stunned by use of a captive bolt pistol before they are hoisted on to the slaughterline and bled.

67. To date the number of deer slaughtered in abattoirs is small and consequently the opportunity for many people to have observed the operation in practice is extremely limited. In Scotland where slaughter is not normally permitted official authority was given in 1982/83 for a controlled trial to be set up for the slaughter of red deer in a registered slaughterhouse in Banffshire. Some 250 deer have been included in this trial over the two years it has been running.

68. Those who had the opportunity to observe the trial in 1983 included members of the Group, inspectors of the local association for the Prevention of Cruelty to Animals as well as representatives of the State Veterinary Service and also the Official Veterinary Surgeon who was present on all occasions. None of those present reported any welfare problems with the deer and veterinary inspection of the carcases revealed no evidence of
injury or serious bruising which might have pointed to problems in the transport and handling of the deer. The company which operated the slaughterhouse and carried out the trial reported that measurement of muscle pH levels in the carcases (an indicator of pre-slaughter stress) showed a consistently low level which suggested that stress during transport and slaughter had been low.

69. Members of the Group who observed the trial concluded that the slaughter operation which they had seen had been efficiently conducted throughout and no evidence had emerged which would justify a recommendation to ban slaughter of deer in slaughterhouses given the conditions operating for the trial. Since the Group's visit had been pre-arranged it has to be acknowledged that the operation was probably observed under the best of conditions. However, a subsequent 'unannounced visit' by a Group member and the reports of other observers present for the full trial or on other occasions give no indication that the operation as seen by the Group was other than a fair representation of the normal situation. It was also evident that the deer which had not been used to regular handling could be handled as well as the tamer deer.

70. The Group has given much consideration to the specific areas of concern expressed by those objecting to the slaughter of deer in slaughterhouses. Their findings on these are as follows:

(a) **De-antlering before abattoir slaughter** — It is possible that the handling of deer for such de-antlering may create some stress. Nevertheless de-antlering is acceptable as a normal husbandry procedure. Veterinary advice is that de-antlering in itself is a painless operation because there is no nerve supply to the antler once the velvet has been shed. (De-antlering in velvet is prohibited).

(b) **Rounding up, handling and transportation to the slaughterhouse** — Farmed deer are likely to be used to being rounded up and handled. The transport of deer generally, which is discussed in paras 47 to 52, has not been found to create unacceptable stress for deer and could not therefore provide justification for a specific ban on transportation to slaughterhouses. Proposals for safeguarding deer in transit have also been recommended in the draft code.
(c) **Noise of the slaughterhouse and the alien environment** – These factors already apply to all livestock although it is acknowledged that deer would be expected to be more sensitive to them. It is clear that if deer are to be taken to slaughterhouses then legislative provision must be made for the appropriate design of the lairage and slaughtering facilities for deer which must be separated from other slaughterhouse activities.

(d) **Adequacy of slaughterhouses and ability of slaughterhouse staff to handle deer** – It is evident that specific standards for design of the slaughterhouse facilities can be reproduced, as in the Scottish trial, and prescribed in legislation. Slaughtermen trained in the slaughter of deer and licensed for that particular purpose are essential. It is not however essential for the handlers to be familiar to the deer nor has it been found that there are particular problems with those deer which are not used to being handled.

(e) **Standards of enforcement of specific welfare requirements** – Lack of enforcement is a factor which can apply to all slaughter operations but we believe it is very much easier to supervise slaughterhouse activities on a regular basis than it is to keep a check on slaughter on a farm. The appointment of a designated official, responsible for welfare, has already been recommended by the Council in its report of the welfare of livestock at slaughter*, for all slaughterhouse activities. In addition the Group proposes that slaughtermen will have to be licensed to slaughter deer and will therefore be subject to more control than would marksmen in the field.

71. As part of its enquiry the Group also consulted a veterinary official from the New Zealand High Commission. The slaughter of deer in purpose built deer slaughterhouses is normal practice in New Zealand and plants can slaughter 40 to 100 deer per day. No welfare problems are apparent and large numbers of deer are transported over considerable distances with no evidence of specific problems.

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72. With an increase in the size of deer farms and the greater related emphasis on marketing and aspects of quality, including hygiene, it has to be recognised that the shooting of large numbers of deer in the field will not be practicable and the volume of deer and carcases to be handled will bring increasing demands for the slaughter operation to be carried out where adequate and appropriate facilities exist. Members also have reason to believe that on humanitarian grounds some deer farmers would prefer to have their animals slaughtered in slaughterhouses:

73. The Group has concluded that it could not sustain a proposal to ban slaughter of deer in slaughterhouses on welfare grounds. It is therefore RECOMMENDED THAT, SUBJECT TO CERTAIN SAFEGUARDS, THE SLAUGHTER OF FARMED DEER SHOULD BE PERMITTED IN SLAUGHTERHOUSES LICENSED FOR THAT PURPOSE; THEREFORE (a) SCOTTISH LEGISLATION SHOULD BE AMENDED ACCORDINGLY AND (b) LEGISLATION IN ENGLAND, WALES AND SCOTLAND SHOULD PROVIDE FOR WELFARE SAFEGUARDS FOR THE SLAUGHTER OF DEER IN SLAUGHTERHOUSES.

74. The recommended safeguards form two categories. First, there are proposals for regulations for all deer slaughter operations in slaughterhouses. Secondly, there are proposals for Codes of Practice for the slaughter operation which would not in themselves be mandatory but as recommended guidelines should have the backing of the legislation. The proposals are as follows:

PROPOSALS FOR LEGISLATION/REGULATIONS FOR DEER IN SLAUGHTERHOUSES

75. (a) Only those deer coming within the proposed definition for the purposes of the Agriculture (Miscellaneous Provisions) Act 1968 (see para 25) and which are conspicuously marked should be permitted to be slaughtered in slaughterhouses.

(b) The slaughter of deer should be permitted only in slaughterhouses which are licensed for that purpose (in addition to the licensing requirements for the slaughter of other species where that also occurs).

(c) Such licences should be subject to annual renewal and should be issued only with the approval of central Government Departments.
(d) Conditions to be met in the granting of such licences shall include the following:

(i) Responsibility for the welfare of deer at slaughter, including responsibility for the general supervision of unloading, lairing and slaughter, to be allocated to a veterinary surgeon who must always be present when the deer are being stunned and slaughtered.

(ii) The design and provision of lairing and stunning facilities to be subject to approval by central Government Departments.

(e) Deer must not be slaughtered while other animals are being handled and/or slaughtered within the same part of the lairage and/or slaughterhouse, unless separated from other activities by solid walls to exclude noise.

(f) Deer of less than six months of age must not be taken to slaughterhouses.

(g) Goads or sticks must not be used in the handling of deer for slaughter.

(h) Reception areas for the unloading of deer and lairage pens must have smooth walls, at least 7 ft high, and have subdued lighting both in the pens and in the inter-connecting corridors. All reception/lairage pens should inter-connect and the final lairage pen should have direct access into the stunning pen.

(i) Stunning must be carried out only in a pen suitable for the stunning of deer. Deer must be stunned by a stunning instrument approved for that purpose.

(j) The stunning and slaughter of deer should be carried out only by a slaughterman specifically licensed for that purpose. In the granting of such licences the local authority must be satisfied that the individuals concerned are trained in the handling of deer.

(k) Prior arrangements must be made with the management of the slaughterhouse for the delivery of a batch of deer for slaughter. The slaughterhouse management must be responsible for advising the Veterinary Surgeon responsible for welfare in advance of the planned slaughter of deer.
PROPOSALS FOR CODES OF PRACTICE FOR DEER IN SLAUGHTERHOUSES

76. (a) Deer should be laired in familiar groups and not mixed with deer from other farms. Sexes should be segregated where the deer are over 16 months of age. Stags during the rut, injured and diseased animals should not be brought for slaughter.

(b) Deer must be unloaded in a quiet, orderly manner directly into the reception and lairage pens. No more than 20 deer should be kept in each reception or lairage pen.

(c) Deer should be rested for approximately one hour in the lairage before slaughter. On present evidence it is recommended that deer are not left in the lairage for more than three hours and should not be laired over-night, but this recommendation should be kept under review. Adequate water supplies should be available in the reception and lairage pens.

(d) The use of noisy fittings must be avoided and where appropriate fittings should be baffled to reduce noise.

(e) A frontal stunning position for effective use of the stunning pistol is recommended.

77. It should be stressed that these safeguards specifically for the welfare of deer at slaughter are intended to supplement the existing provisions of legislation and Codes of Practice relating to the humane slaughter of farm livestock.

FARM ABATTOIRS

78. There has been some limited use of specially constructed abattoir facilities on deer farms, notably at the Hill Farming Research Organisation premises at Glensaugh where deer slaughter has been observed by members of the Group. It seems clear however that costs of construction and operation are a major factor which will limit development of such facilities.

79. The Group concluded that account should nevertheless be taken of farm abattoirs in drawing up regulations and guidelines for deer slaughter. It thus RECOMMENDS THAT THERE SHOULD BE A REQUIREMENT FOR ALL FARM ABATTOIRS TO BE SPECIFICALLY LICENSED FOR THE SLAUGHTER OF DEER AND FOR THE SAME REGULATIONS AND
CODES AS PROPOSED FOR NORMAL SLAUGHTERHOUSE OPERATIONS TO BE APPLIED TO SUCH FACILITIES. It was recognised that the lairing requirements would not always be appropriate for animals being slaughtered on the farm of origin and it was therefore proposed that there should be an exemption from these requirements in relation to deer which had not been subject to transportation to the farm abattoir within the previous 24 hours.

DEER MARKETS/AUCTIONS

80. The Group considered the general question of whether the sale of deer should be permitted at auction both on farms and at markets where there is free access to the general public and, more particularly, whether guidelines and regulations should be proposed.

81. Very few sales of deer have been held and because there has been very limited opportunity to gain experience of deer sales and limited evidence on which the Group could base any conclusions, it was decided that judgement would be reserved on this particular subject. The matter will however be kept under review by the Council with a view to recommending regulations and guidelines once it becomes clearer what welfare safeguards would be appropriate.
SUMMARY OF RECOMMENDATIONS FOR LEGISLATIVE
AND OTHER ACTION


2. Close season exemption for the killing of farmed deer to be extended to England and Wales. In Scotland, England and Wales the qualifying status of such deer should be those falling within the 1968 Act provisions, as proposed for amendment, provided they are conspicuously marked to indicate ownership by the deer farm concerned. (para 34).

3. Farmed deer to be covered by the Movement of Animals (Records) Order, 1960. (para 36).

4. The movement of farmed deer in England and Wales to be exempted from the licencing requirements of Section 11 of the Deer Act 1963. (para 46).

5. Consideration to be given to preventing the release of farmed deer for sporting purposes. (para 40).

6. Guidelines on the transport of deer to be included in the proposed welfare code. (paras 16 & 50).

7. Guidelines on field slaughter to be included in the proposed welfare code. (para 58).

8. Further consideration to be given to the possibilities for controlling the issue of firearms certificates so that more account is taken of the ability of the marksman for the shooting purposes required. (para 61).

9. Subject to specified safeguards, the slaughter of farmed deer should be permitted in slaughterhouses licensed for that purpose. (paras 73, 75 and 77).

10. Codes of Practice to supplement the proposed regulations should be provided for the slaughter of deer in slaughterhouses and should have legislative backing. (paras 74 & 76).

11. All farm abattoirs slaughtering deer to be specifically licenced for that purpose and regulations and codes as proposed for other slaughterhouses to apply to such facilities. (para 79).
SLAUGHTER OF DEER IN LICENSED SLAUGHTERHOUSES – DISSENTING NOTE

1. We, the undersigned – who are members of FAWC but were not members of the Deer Group – are not in agreement with the findings and recommendations contained in paras 65–77 of the Deer Report which set out requirements for the slaughter of deer in abattoirs.

We feel that a move to encourage the abattoir slaughter of deer is premature. FAWC’s ‘Report on the Welfare of Livestock at the time of Slaughter’ highlighted some very unsatisfactory conditions in slaughterhouses, resulting in much suffering for livestock, and we would not wish to see these semi-wild deer brought into them until there have been substantial improvements in welfare.

We are not alone in our anxiety. Of the nine organisations consulted by FAWC on deer slaughter only two were in favour of abattoir slaughter, four were against, and three expressed the view that more research and investigation were needed.

2. Deer have been kept in parks for hundreds of years and these park deer may be tamer than wild deer. But deer farming is a completely new operation, so new that animals are still being taken from the wild to build up herds. The animals are still essentially wild animals with varying degrees of tameness, depending on species, whether or not they have been born in captivity and the amount of handling they have had. Moreover this tameness is an unpredictable characteristic – deer which have been tame in one situation may suddenly become much less tame in another.

Domestication, as opposed to taming, will require a much longer time scale.

The Preface to the draft Deer Code states:

'It has to be recognised that deer, even when reared and enclosed in the farm situation, may not become as tame or tractable as other species and will retain many of the characteristics found in their wild state.'

and the Introduction to the Code emphasises:

'In general, deer are highly strung, nervous animals which can be easily excited or frightened'

and points out that different species react differently, for example that fallow deer are very flighty. Wapiti crosses may well be considerably larger than other farmed species. Yet no differentiation has been made in the recommendations covering abattoir slaughter.
3. Other species of farm animal — cattle, sheep and pigs — have been domesticated for thousands of years. But even with these highly domesticated species FAWC members

‘formed a subjective opinion that (the) animals are fearful of the situation generally in the slaughterhouse — of the noise, smell, handling and strangeness of the surroundings.’ (para 75 FAWC Slaughter Report)

4. The FAWC Slaughter Report highlighted some very unsatisfactory conditions in slaughterhouses — lack of enforcement of existing welfare legislation, poor handling and poor stunning. It also stressed the need for greater interest and involvement by management and the need for training of slaughtermen. FAWC made 117 recommendations. The Government has yet to formulate its proposals in reply to the Report (which was published in June 1984) and, with the best will in the world, it will obviously be some considerable time before effective action brings about any substantial improvement. It is far too soon to contemplate introducing yet another species — and a semi-wild species at that — into this traumatic environment. One has also to remember that park deer, and many farmed deer, would never even have been inside a building before.

5. ‘The additional features of abattoir slaughter compared with field slaughter are that the deer have to be collected together for loading and transportation to the slaughterhouse (and de-antlered if stags), unloaded and laired in the slaughterhouse lairage for a short period, marshalled into a stunning pen where they are restrained and stunned by use of a captive bolt pistol before they are hoisted on to the slaughterline and bled’ (para 66 Deer Report).

Let us look at some of these additional features.

Para 49 of the Deer Report says that ‘providing suitable transport was used deer could travel long distances without appearing to suffer any stress’ and para 50 emphasises the ‘importance of having an experienced handler to accompany the deer’. Para 70(d) says that ‘it is not essential for the handlers to be familiar to the deer’, but it is surely essential to have handlers experienced with deer, and with the many different species of deer. These, however, are only recommendations and we can have no guarantee that deer will not be transported by livestock hauliers in their usual transporters and handled with and in the same way as other livestock. The Deer Group appear to have too much confidence in the ability of the proposed code guidelines on transit and slaughter (which supplement the proposed regulations) actually to
protect these animals. Codes covering other species have been widely ignored. And the FAWC Slaughter Report shows wide disregard even for existing legal requirements.

Although some deer farmers de-antler stags to make them easier to handle others manage without. Stags shot in the field do not have to be de-antlered (which, although painless, is certainly stressful) and the fact that they are de-antlered prior to being taken to a slaughterhouse is therefore an additional, and unnecessary, stress at the time of slaughter.

6. The one slaughterhouse killing deer under experimental licence in Scotland has been operating for two years under extremely closely controlled conditions and cannot be compared to normal slaughter operations. Deer were transported by their handlers on the farm (and not by livestock hauliers), taken a maximum of 55 miles and slaughtered after normal working hours when all the usual bustle and noise of the slaughterhouse had ceased. During a major part of the time the animals were taken right up to the point of slaughter by experienced handlers and it was only during the last few months that slaughterhouse staff (trained by these handlers) undertook the operation without help. Even then they have been supervised by a former staff member of the Rowett Research Institute expert in handling deer.

At their one visit to the trial the FAWC Deer Group did not see the arrival of the deer at the abattoir (or the vehicle in which they had been transported), they did not see the animals unloaded, but (with some difficulty owing to the dim light and high walls) did see the animals in the lairage and moved to the stunning pen and shot. During this visit the animals were handled throughout by trained staff from the Rowett Research Institute.

We are not surprised that under such unique conditions the ‘measurement of muscle pH levels in the carcasses (an indicator of pre-slaughter stress) showed a consistently low level which suggested that stress during transport and slaughter had been low’. (para 68 Deer Report)

7. FAWC members were aware of reports of injury and suffering caused to deer by irresponsible and poor shooting by sporting interests. But the Group recognised that deer farmers would, in their own interests, make sure that marksmanship was of a very high standard. The British Deer Society runs courses for deer marksmen. In its 1981 Guidelines for British Deer Farmers the British Deer Farmers Association explains:
Most British deer farmers slaughter their deer in the field using a rifle. If done regularly over several days or weeks while the deer are being fed this causes surprisingly little reaction. (Some of us can confirm this from our own experience). 'No farmer likes killing his own stock', the Guidelines states, but emphasises that 'it is surely preferable that they are killed on the farm rather than sent to separate premises', although the Association obviously now considers this to be impracticable with large numbers.

8. The Deer Report is saying that because of the numbers of deer coming up for slaughter and because of hygiene considerations there will be an increasing demand for deer to be slaughtered in slaughterhouses. Yet, although the number of deer farms has increased, average herd sizes are still around 30 - 150 hinds (or 100 - 500 total herd size). With a calving rate of 80%, and assuming that all are reared for slaughter, it would mean that these farms would have between 24 and 120 deer to kill per annum. We understand that deer are normally killed during the three-monthly period running from September to November – which would mean a weekly kill during these three months of between 2 and 10 animals. The largest herd has around 500 hinds, but even this number would only result in a possible 400 calves a year, or a weekly kill of around 33 calves over the twelve week period.

We know of at least one slaughter group which offers the services of an expert marksman, and we know that some deer farmers already call in experts to carry out the shooting.

Properly organised, therefore, killing on the farm should present few problems. We would prefer to see the occasional double shooting in the field than for deer to be taken to slaughterhouses. Even in the slaughterhouse there is no guarantee that some animals would not have to be shot twice with a captive bolt pistol before being effectively stunned (as we have seen with the slaughter of cattle).

9. When deer are shot on the farm they are immediately bled and taken into the 'larder' pending dressing or collection by slaughterhouse lorries. We have been offered no evidence of any kind that hygiene has been impaired by this process. Indeed the venison produced in this way is probably far more hygienic than the 'game' venison so far supplied to shops, and which has attracted no criticism.

10. The Slaughterhouses Act 1974 covering England and Wales (and the corresponding Scottish Act) lays down provisions as to slaughter. The means of stunning/killing are described and exemptions set out for religious groups. The methods of slaughter section (Section 36 of the
Act) applies only to horses, cattle, sheep, swine and goats. Deer seemingly are not thus mentioned either in the welfare provisions of this section of the Act or the exemptions.

11. The British Deer Farmers Association reported that in 1983 there were some 112 deer farms producing around 3 000 carcases annually. There have been many future projections for the number of carcases that could be produced/marketed — 100 000 a year is a favourite being bandied around, but these are only projections and may well be in the realms of wishful thinking. Price, consumer demand and the shift in fashion away from red meat, may keep numbers low. Sales have been likened to those of veal the production of which, in spite of high powered salesmanship in recent years, has, we understand, remained at much the same level for years.

12. We would finish by repeating that the encouragement of abattoir slaughter of deer is in our opinion premature. Scottish legislation should not therefore be amended to permit it and serious consideration should be given to amending the Slaughterhouses Act 1974 (covering England and Wales) to preclude deer. And we would again emphasise that there is no evidence that the number of deer needing to be slaughtered is increasing to unmanageable levels, no evidence that hygiene is at risk, and no evidence that a slaughterhouse operation would be a humane alternative to field killing. We need that evidence before acting.

Angela Bates
Philip Brown
Roger Ewbank
Ruth Harrison
APPENDIX A

INFORMATION ON FARM ANIMAL WELFARE COUNCIL

The Farm Animal Welfare Council was set up in July 1979 by the Minister of Agriculture, Fisheries and Food and the Secretaries of State for Scotland and for Wales under the Chairmanship of Professor Sir Richard Harrison, Emeritus Professor of Anatomy, University of Cambridge. It has been given the responsibility of keeping under review the welfare of farm animals on agricultural land, at markets, in transit and at the place of slaughter. The Council advises Agriculture Ministers of any legislative or other changes that may be necessary and as an independent advisory body is free to publish any advice so given.

Members of the Council are appointed by Ministers and serve in a personal capacity.

They are:
Chairman:
Professor Sir Richard Harrison, FRS, MA, MD, DSc, MRCS, LRCP.

Members:
   Mr C B Atkinson, ARICS
   Mrs M A S Bates, BSc (Agric)
   Rev A L Birbeck, M A
   Mr P L Brown, BSc, MRCVS
   * Mr S Burgess, FBIM
   Mr J H Cullimore, JP
   * Professor J M M Cunningham, CBE, BSc (Agric), PhD, FRSE, FI Biol.
   Dr M S Dawkins, MA, D Phil
   Mr R Ewbank, MVSc, MRCVS, FI Biol
   Mrs R Harrison
   * Mr D L Haxby, MRCVS
   Mr J A Inverarity
   Mr M R Lampard, MA
   Professor J O L King, PhD, MVSc, BSc (Agric), FRCVS, FI Biol.
   * Mr R Macpherson, MRCVS
   Mr E T F Marsh, BEM
   Dr D W B Sainsbury, MA, BSc, MRCVS
   Mr P Staines
   * Mr J G Thomas, BSc (Agric)
   * Mr P A Walker, JP
   Professor A J F Webster, MA, Vet MB, PhD, MRCVS

* Members of the Deer Working Group
Former members of the Council who served on the Deer Working Group during the early stages of the review were:

Mrs G Knight
Mr D G Llewellyn, BVSc, MRCVS

Farm Animal Welfare Council Secretariat
Hook Rise South
Tolworth,
Surbiton
Surrey
KT6 7NF
APPENDIX B

ORGANISATIONS AND INDIVIDUALS WHO RESPONDED TO THE INVITATION TO SUBMIT EVIDENCE (See para 3)

British Deer Farmers Association
British Deer Society
British Veterinary Association
Central Council of Societies in Scotland for the Prevention of Cruelty to Animals
Farm and Food Society
Farm Animal Welfare Co-ordinating Executive
Forestry Commission
Dr J Henshaw
Highlands and Islands Development Board
Mr J Hotchkis
Humane Slaughter Association
Red Deer Commission
Rowett Research Institute
Royal Society for the Prevention of Cruelty to Animals
Universities Federation for Animal Welfare
Veterinary Deer Society
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OTHERS WHO ALSO ASSISTED THE COUNCIL IN THE COURSE OF THE REVIEW

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APPENDIX C

DRAFT CODE OF RECOMMENDATIONS FOR THE WELFARE OF FARmed DEER (See paras 13–17)

PREFACE

The basic requirements for the welfare of deer are a high standard of stockmanship which includes an understanding of the unique behavioural characteristics of the species being farmed. Husbandry systems should ensure the health and safety of animals and take account of their behavioural habits.

This Code has been drafted to meet the particular needs of a few species which have only in recent years become a part, albeit small, of the farm livestock scene. It has to be recognised that deer, even when reared and enclosed in the farm situation, may not become as tame or tractable as other species and will retain many of the characteristics found in their wild state. This Code, therefore, takes account of these special characteristics and endeavours to provide welfare guidelines based on the present state of knowledge and soundest current husbandry practices. Any farmer embarking on deer farming without acquiring some knowledge of the special characteristics and needs of these species does so at great risk to the welfare of deer. It is particularly important that he should be aware of and familiar with the basic guidelines, as contained in the Code, before starting a new farmed deer enterprise.

The Code places particular emphasis on the handling of deer and the special requirements for accommodating them both in the field and when housed.

Included in the Code are guidelines on the slaughter of deer, both for slaughter in the field and in licensed slaughterhouses. The status of the Code recommendations for field slaughter will be the same as that for other on-farm practices covered in the Code, i.e. made under the provisions of Section 3 of the Agriculture (Miscellaneous Provisions) Act 1968 and therefore having the statutory backing of that legislation (NOTE. This will not be the case for the Code recommendations on slaughterhouse practices and the Council has advised that these should be given equivalent statutory backing by appropriate amendment to the slaughterhouse legislation. These particular Code recommendations are intended to supplement the regulations which the Council has proposed to protect the welfare of deer in slaughterhouses).
Advisory guidelines are also included on the transport of deer because this is another area where there are special needs for deer which are not necessarily appropriate to other livestock. Here again, insofar as transportation takes place off the farm, these Code provisions will not have the statutory backing of the Agriculture (Miscellaneous Provisions) Act 1968 but will supplement existing transit of animals legislation.

It is intended that this Code should apply to all deer kept on farms or in parks. It is not the intention that the Code should apply to feral deer which though they may be on agricultural land are not within the occupier’s control.
INTRODUCTION:

(1) The Code relates to all farmed deer but, bearing in mind that the majority of species farmed are red or fallow deer, the recommendations have been drafted with these species particularly in mind.

(2) The welfare of deer can be safeguarded and their behavioural needs met under a variety of management systems. The system and the number and stocking rate of deer kept at any one time should depend on the suitability of the conditions and the skill of the stockman. All stockmen should be familiar with the behaviour of deer and must be competent in their handling and management to safeguard the welfare of the herd and individual animals.

(3) In general, deer are highly strung, nervous animals which can be easily excited or frightened. When accustomed to the sight and sound of man, wild deer can be tamed to a considerable degree. Hand-reared animals may become exceedingly tame. Nonetheless, they have different behavioural characteristics from other farmed animals.

(4) Account should also be taken of the different behavioural characteristics within the species most commonly ‘domesticated’, e.g. Red Deer (Cervus Elaphus), Sika (Cervus Nippon), Fallow (Dama Dama). Red deer can become relatively tame. Fallow deer are very flighty in behaviour and much less tractable than red deer; this is an important consideration when deciding which species to farm.

(5) Badly managed deer do not thrive and the stockman needs to watch for signs of disease or distress. The good stockman will be able to recognise trouble in its early stages and may be able to identify the cause and put matters right immediately. If the cause is not obvious, or if the stockman’s immediate action is not effective, veterinary or other expert advice should be obtained as soon as possible.

(6) The signs of ill-health may include listlessness, loss of appetite, (except natural seasonal inappetance), failure to cud, lameness, persistent coughing, swollen joints and discharge from the nostrils and/or eyes. Calves being artificially reared indoors should be inspected twice daily for signs of scouring or respiratory disorders which may spread rapidly.
HANDLING AND INSPECTION:

(7) Handling and movement of deer require special skills and they should be handled gently and never rushed. It is helpful to train deer, particularly as calves, to respond to a distinctive call or inducement, such as feed, and to continue this practice throughout their life.

(8) It is best if there is a minimum of disturbance of hinds during the calving season. It is preferable that the stockman is known to the hinds concerned and is experienced and competent in the techniques of calving and should pay particular attention to hygiene, especially at assisted calvings. If assistance at calving is deemed necessary, it must be realised that hinds so assisted may abandon their calves; facilities for artificial rearing should therefore be available.

(9) For breeding, sires should be carefully selected taking into account breed, size, age and previous record, so as to reduce the likelihood of subsequent calving difficulties. Sires from larger breeds should not be used for hinds less than three years of age. Hinds should be managed so as to be in suitable bodily condition at the time of calving.

(10) Stags must be considered as dangerous at all times and deer should not be handled during the rut. (See paras 14-17 re. darting).

(11) The preferred method for handling small animals is to cradle in the arms with hands positioned around the hind quarters and around the brisket. If of an appropriate size, deer can also be safely and effectively handled by restraining them against the wall of a handling pen by putting an arm around the neck and one knee against the lower abdomen. For large animals, suitable restraining facilities will be required.

(12) Deer should be inspected daily when housed as well as in other special circumstances, e.g. at calving time.

(13) For the safety of handlers and the welfare of animals, antlers should be removed above the pedicle as soon as they are out of velvet.*

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* The removal of antlers in velvet is controlled by:

b) The Veterinary Surgeons Act 1966 (Schedule 3 Amendment) Order 1980
c) The Removal of Antlers in Velvet (Anaesthetics) Order 1980
USE OF DART GUNS

(14) Darting to sedate the deer will sometimes be necessary. The use of dart guns should however be limited only to essential circumstances, e.g. when an injured deer needs treatment or when the handling or transportation of a deer cannot be accomplished in safety for both the deer and the handler.† The user of a dart gun will need to be familiar with all aspects of its use (including correct charges, etc.).

(15) He can only obtain drugs for use in the weapon from his veterinary surgeon. Those drugs will be supplied with directions^ regarding use and safe keeping of the drugs and also advice on what to do in an emergency situation, for example if an unintended target is struck. Advice will also be given by the veterinary surgeon concerning the use of any drugs used for revival. These directions must be observed. It must be borne in mind that it can take several minutes after impact of the dart for the drug to take effect and that the darted deer can run for some distance.

(16) Where a drug is used to reverse the effect of a sedative given by dart gun, recycling may occur in that the animal may pass in and out of the sedated state several times over a period of several hours. In these circumstances a responsible person should keep the animal under frequent observation until it is certain that it has recovered sufficiently from sedation to be left without supervision. With continued or prolonged sedation animals must be carefully handled.

(17) It is recommended that deer are not darted near water; they are difficult to extract if they fall into water and may drown.

†The possession of dart guns is controlled by the Firearms Act 1968.

*The sale and supply of all immobilising drugs is controlled by the Medicines Act 1968. These drugs are highly dangerous to human beings and can be lethal.

^A model agreement providing guidelines for the use of controlled drugs with dart guns is available from The Veterinary Defence Society, 1a Princess Street, Knutsford, Cheshire.
DEER TAKEN FROM THE WILD

(18) Deer taken from the wild are likely to be very nervous and will therefore need very careful handling until they become acclimatised to the farm situation.*

(19) Calves should receive colostrum from their dams, and must therefore have suckled before weaning and survival will be improved if they weigh at least 6 kg (13.2 lb). Calves may be housed in pens up to a minimum of three months of age, or, alternatively kept in outside runs with adequate shelter. Calves should not be kept in isolation. (See para 38 re. artificial feeding.)

(20) Newly-captured deer should be left in their new surroundings for a few days with the minimum of disturbance. It is preferable that they are released carefully into enclosures large enough to allow them to find cover and to become gradually familiar with human presence. It may be advantageous to include a few ‘tame’ deer in the enclosure who can ‘teach’ the others to take concentrates but careful supervision will be needed to ensure that the feral deer are not bullied and thereby prevented from feeding.

HANDLING PENS

(21) When deer are to be handled, properly constructed handling pens should be provided. There is a wide range of satisfactory designs and layouts and it is recommended that specialist advice is sought before constructing new facilities.

(22) Where deer are to be confined, pens should have solid sides with no projections to minimise the risk of injury to the deer. It is essential that they are of an adequate height, not only to prevent escape but also to discourage any attempt to escape, thereby preventing possible injury. Walls need to be higher for Fallow deer than for Red deer. Recommended heights are:

for Fallow deer – 3.0m (approx 10ft)
and for Red deer – 2.4m (approx 8ft)

*In England and Wales the taking of deer is controlled by the Deer Act 1963, as amended. In Scotland the Deer (Scotland) Act 1959, as amended, controls the taking of deer from the wild.
(23) All species of deer handle better in subdued light. It is strongly recommended that close handling pens be covered to achieve this effect.

(24) Provision for segregation should be made but it is desirable that segregated animals are able to see their fellows otherwise they may panic.

(25) There is a tendency for deer to rush at any open fences in the handling area. To avoid the risk of injury, the approach fences to pens should be of close mesh or covered with a suitable material, such as hessian.

(26) Properly designed and constructed loading facilities should be incorporated in the handling pens where possible.

STOCKING RATES

(27) Most types of land can be used and the number of stock held will relate to such factors as the type and quality of the vegetation, the season, disease risks, etc.

(28) Stocking rates on hill grazings need to be adjusted so as to ensure that animals will maintain an adequate body condition in winter, otherwise supplementary feeding should be offered.

(29) Overstocking, particularly during the calving period, may lead to behavioural vices, e.g. hinds beating and trampling calves.

PROVISION OF SHELTER

(30) Deer, not being well insulated, are particularly sensitive to weather conditions and if adequate topographic or vegetative shelter is not available the provision of suitable artificial shelter is recommended.

(31) Calving hinds tend to seek solitude in natural cover, e.g. in patches of bracken. Where this is absent suitable shelter, e.g. lopped tree branches, straw bales, should be made available for new born and young calves.
FENCING

(32) To avoid attempts to escape, a high standard of perimeter fencing, of around 2.0m (6ft 6in) high, is essential. A wide range of fence types is available and advice should be sought as to the most appropriate type for specific conditions.

(33) When deer are driven alongside fences, leading towards handling pens, they may seek to escape and injure themselves. Such fences therefore need to be of a suitable mesh, (maximum 6 cm), covered with hessian or other suitable material to prevent the deer seeing through the fence, and be free of projections.

(34) Deer which have not been used to electric fencing are best run in a non-electrified enclosure until they have settled down.

FEED AND WATER

(35) In all systems, deer must receive a daily diet which is adequate to maintain health and wellbeing.

(36) Feeds used for other ruminant livestock are generally suitable for adult deer but care must be taken to ensure that the content of compound feeds should not include any substance harmful to deer. Because of winter inappetance, special care is required to ensure that deer do not lose excessive condition during this period.

(37) Deer must have access to a plentiful supply of fresh, clean water.

(38) Deer calves can be artificially reared. During the first five to eight weeks of life calves should receive liquid food, of a type suitable for this species. (In particular, calf food substitutes formulated for bovines are not suitable.) Such calves should have access to a palatable feed compound and clean water and also have access to roughage from an early age, say four to five weeks.

(39) Changes in diet need to be introduced gradually; sudden changes may cause digestive problems and even death.

(40) Arrangements should be made in advance to ensure that adequate supplies of suitable food are made available to deer in emergencies (e.g. in heavy snow).
HOUSING

(41) Adult deer are normally not required to be housed but provision should be made for bullied, injured or sick animals to be protected and separated — preferably where they can still see other animals. Adult deer may also be housed temporarily just before or after transport.

(42) On exposed farms, under severe climatic conditions or where competition for grazing or food may occur, consideration should be given to housing calves during their first winter.

(43) Most conventional farm buildings can be used for deer but may require modification. Advice on welfare aspects should be sought before housing deer.

(44) Pen sides should be at least 2.0m (6ft 6in) in height, be without projections or sharp edges and with fittings arranged so as to avoid injury. It is preferable for partitions to be of solid construction up to a height of 1.2m (approx 4ft) to limit the spread of disease or vice and minimise the possibility of broken limbs.

(45) Floors should be designed, constructed and maintained to avoid discomfort or injury and be adequately drained. The use of clean, dry bedding is desirable but part of the floor area may be kept free of bedding as a hard surface will contribute to maintaining sound feet.

(46) Adequate ventilation should be provided with particular care being taken to avoid draughts.

(47) Pens should be designed so that calves can see other groups. If they can also have sight and sound of other farm activity this may have a beneficial taming effect.

(48) When continuously housed, deer should be kept in small groups of 10-15 and balanced for size and weight. Housed, mature stags (three years or over) in antler, must be penned individually.

(49) The floor space allowance must take into account the age, sex, weight and the environmental conditions. There should be sufficient trough space, or feeding and water points to avoid undue competition for food, especially when foods are rationed.
(51) Paints and wood preservatives which may be toxic to deer should not be used on surfaces accessible to them. Particular care is necessary to guard against the risk of lead poisoning from old paintwork in any part of a building or where secondhand building materials are used.

(52) In the design of new buildings, or the alteration of existing buildings it is desirable to provide, wherever possible, for stock to be released and evacuated quickly in cases of emergency. Materials used in construction should have sufficient fire resistance to enable emergency procedures to be followed.

(53) All electrical, gas and oil services should be planned and fitted so that if there is overheating or if flame is generated the risk of flame spreading to equipment, bedding or the fabric of the building is minimal.

**TRANSPORT**

(54) Deer can be moved satisfactorily in most animal transporters.*† It is important that the animals are accompanied on any journey by someone experienced in the handling of deer.

(55) Frequent inspection of animals is essential particularly since those which become recumbent can be easily damaged by trampling. A source of artificial light should be available for inspection.

(56) Where a sedated animal is to be transported a responsible person should travel in or with the transporter, whether or not a revival drug has been used, and the animal be examined frequently, e.g. at hourly intervals. (See also paras 14-17). Sedated animals need to be individually penned.

(57) The transporter should be provided with sufficient adjustable ventilators and be free of internal projections (which may damage animals). Strong draughts should be avoided, particularly in cold weather.

*The transport of deer is covered by the Transit of Animals Order 1927, the Animals (Sea Transport) Order 1930 and the Transit of Animals (General) Order 1973. Regulations set by the International Air Transport Association are also relevant.

†In England and Wales deer may only be netted, trapped, drugged or darted for the purpose of removing them from one area to another under licence issued by the Nature Conservancy Council (Section 11 of the Deer Act 1963).
(58) Deer will settle better if the interior of the transporter can be darkened and the floor is liberally bedded. The floor and unloading ramps of transporters should be constructed with non-slip surfaces.

(59) Animals should be segregated by species, age, sex and size, as well as previous familiarisation.

(60) The following classes of animal should not be transported:
   Stags during the rut, unless sedated and under such veterinary supervision as is necessary to ensure the animal’s safety throughout the journey.
   Stags in velvet, unless individually penned and handled with care.
   Hinds which are heavily pregnant.
   Hinds with calves at foot under six months of age.

(61) Adult stags should be individually penned and preferably be de-antlered+ if over two years old.

(62) It is helpful if animals are accustomed to a confined space before transport. Those that are less tractable should be housed for up to a week.

(63) Where deer are housed, it is essential to provide facilities for loading and unloading and for their safe conduct through the building to and from the housing pens.

(64) Except for very short journeys, animals should be allowed sufficient space to lie down, get up easily and should normally be allowed space to turn around. (Fallow deer, in particular, lie down during journeys.)

(65) Deer should not be unloaded in the close proximity of an open wire fence because of the risk that they may run in to the fence. Handling is easier if animals are released in dark conditions. It is advisable to rest animals for at least 24 hours after transportation.

(66) On long journeys, water and food should be made available. Dehydration in transit is a problem and animals need to be offered water frequently. The provision of food with a high moisture content, such as cabbages, is helpful. If animals are suffering from heat stress or dehydration they will benefit from hosing with water. Heated animals should be given time to cool before being released into cold temperatures.

+See footnote on page 41 re. the legislation controlling the removal of antlers in velvet.
(67) If deer need to be crated, e.g. for international transport, the crates must be suitably constructed and labelled with full details, including species and management.

FIELD SLAUGHTER

(68) Humane slaughter of deer can be achieved by accurate shooting using a suitable rifle* and ammunition.

(69) Where a rifle is used safety is of paramount importance and the marksman should be trained # and proficient in the use of firearms. Shooting at short range facilitates accuracy and safety.

(70) A safe backstop for the bullet is needed and care must be taken in shooting one deer not to injure others. Shooting from an elevated position such as a high seat or trailer is often helpful in these respects.

(71) Sensible precautions for public safety include: shooting in the early morning when few people are around; walking the perimeter fence of small farms or paddocks on large farms to ensure all is clear; shooting away from roads, houses and gardens.

(72) Where deer are so tame and quiet that they present a stationary target at close range (10 to 20m), a frontal head shot by an expert marksman is wholly effective. With semi-wild deer up to 40m range, a high neck shot (to break the spinal cord) is also suitable. For a more distant target up to 100m, a heart/lung shot is recommended. Shooting over 100m should be attempted only in exceptional circumstances and then only by proven marksmen.

(73) Shooting should be undertaken, preferably by the regular stockman, when deer are quiet, as will occur at a selected regular feeding site when they are being hand fed. Under such circumstances it may be possible to shoot 10 or more deer from a large group before the remainder become unduly disturbed. Factors to take into account in assessing the effect shooting will have on the rest of the herd and deciding the number to shoot include: the size of the original group, stocking density and the amount of cover. Care should be taken not to leave too few since small numbers become unsettled and try to escape. There is also a risk of panic if too small a paddock is used.

*Firearms used to kill deer must comply with The Deer Act 1963 (England and Wales) or The Deer (Scotland) Act 1959, both as amended, and are subject to The Firearms Act 1968.

#The British Deer Society runs courses which include instructions for marksmen who
ABATTOIR SLAUGHTER

(74) Deer should be laired in familiar groups and not mixed with deer from other farms. Sexes should be segregated where the deer are over 16 months of age. Stags during the rut, injured and diseased animals should not be brought for slaughter.

(75) Deer must be unloaded in a quiet, orderly manner directly into the reception and lairage pens. No more than 20 deer should be kept in each reception or lairage pen.

(76) Deer should be rested for approximately one hour in the lairage before slaughter. On present evidence it is recommended that deer are not left in the lairage for more than three hours and should not be laired overnight, but this recommendation should be kept under review. Adequate water supplies should be available in the reception and lairage pens.

(77) The use of noisy fittings must be avoided and where appropriate fittings should be baffled to reduce noise.

(78) A frontal stunning position for effective use of the stunning pistol is recommended.