

BVA position on the welfare of animals at slaughter

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Recommendation 17: Where facilities are restricted to a certain species, weight or height range, Food Business Operators should specify the weight and height range that their facilities can accept to the competent authority, and make provision for horned animals where such animals are accepted for slaughter.

Recommendation 18: There should be further research into the welfare implications of lairage design, management, space, and time spent in lairage. This sh

Recommendation 34: Additional research should be undertaken to determine the overall welfare implications of the use of captive-bolt as a stunning method for horned goats, de-horned goats, and polled goats, including the most effective style of equipment, shot positioning, charge and size of cartridge.

Recommendation 35: There should be further research to determine the efficacy of Single Pulse Ultra-High Current (SPUC) and electromagnetic (microwave) energy stunning.

Recommendation 36: Constant current electrical stunning systems with low stress restraint should be developed to improve the effectiveness of head-only simple stunning.

Recommendation 37: Research should be undertaken by government and industry to develop

health and welfare standards at each stage of the supply chain, including welfare at slaughter and pre-slaughter stunning.

Recommendation 64: Meat and meat products from animals that 3332 Tf1 0 0 1 72.075 710.8 r9(i)-15(t)ndsuatr

BVA position on the welfare of animals at slaughter

Introduction

Slaughter processes should result in a humane death for animals, minimising avoidable pain, distress, fear, and suffering. Welfare at slaughter (including the harvesting of fish) begins on-farm, starting with preparation of animals for slaughter, ensuring they are fit for transport, and ending with slaughter at the abattoir or harvesting station. ⁵

We support the Farm Animal Welfare Committee ⁶ principles of humane slaughter as set out in the FAWC opinion reports on the welfare of farmed animals at slaughter ~~out~~

Current legislative protections

The UK Governments have a legal obligation to ensure that animal health and welfare is safeguarded throughout the slaughter process (from preparation on-farm, transportation, to handling and slaughter processes at the abattoir). High standards of animal welfare throughout the slaughter process require robust legislation with effective monitoring and enforcement, and appropriately trained staff to minimise avoidable pain, distress, fear and suffering.

The UK Animal Welfare Acts provide an overarching framework for those managing animals throughout the slaughter process. Anyone responsible for an animal must ensure that its welfare needs are met, these needs are:

The vital role of the Official Veterinarian (OV)

Official Veterinarians (OVs) are highly trained²⁴²⁵ with multi-species knowledge and continued professional development to protect animal health, animal welfare, public health, and food safety standards. OVs possess a breadth of enforcement powers, and arguably see the largest throughput of animals of any other area of veterinary work. OVs play a vital role in helping maintain public trust and commercial confidence in food production, from safeguarding animal welfare, animal and public health, to identifying notifiable disease to prevent disease spread and providing the trade certification

The role of the OV in abattoirs, whatever the size, is therefore vital in terms of ensuring compliance with current legislation for the health and welfare of animals at slaughter. In addition, it is paramount that OVs have a solid understanding of the meat processing industry and Food Business O

the certification of products for export by carrying out post-mortem examination, welfare checks, animal by product checks and animal identification checks amongst other duties.

The World Organisation for Animal Health (OIE) has emphasised the importance of the role of veterinary surgeons in abattoirs (World Organisation for Animal Health, 2017):

The Veterinary Services of our Member Countries are central to this mission. They have an essential role to play in the prevention and control of food-borne zoonoses, even when

Provision of suitable abattoir facilities

We support the provision of abattoirs across the UK that are compliant with current legislative

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3. Potential risk to welfare

Potential risk of significantly compromising animal welfare but where there is no immediate risk to animals. This may lead to a situation that poses a risk to animals, causing pain, distress or suffering.

4. Welfare critical

Poses a serious and imminent risk to animal welfare or one where avoidable pain, distress or suffering has been caused.

Based on FSA data analysing all level 3 and 4 welfare non-compliances recorded on Chronos over the two-year period from April 2017 to March, 99.9% of all animals slaughtered in England and Wales abattoirs in this period were slaughtered with no animal welfare contravention⁴⁵

In Northern Ireland, OVs

Qualitative behaviour

flighty at different points in the slaughter process eg. at unloading, in lairage, raceways, in the stun pen, including number or percentage in a certain group of animals that demonstrated a specified behaviour.

Injuries recording of incidences and percentages of injury eg, slips, falls, injuries caused by other animals or handling facilities

Effectiveness of stun/slaughter assessing indicators of consciousness after stunning (**see section on Effective stunning, data capture and reporting for more information**)

Vocalisation recording the number and percentagHG

Preparation, transport and acceptance for slaughter

Preparation

As set out in EC Regulation 853/2004, to be accepted into abattoirs, Food Business Operators (FBOs) must ensure that each consignment of animals:

- a) is properly identified;
- b) is accompanied by the relevant information from the holding of provenance;
- c) does not come from a holding or an area subject to a movement prohibition or other restriction for reasons of animal or public health, except when the competent authority so permits;
- d) is clean;
- e) is healthy, as far as the Food Business Operator can judge; and
- f) is in a satisfactory state as regards welfare on arrival at the slaughterhouse.

Importance of cleanliness

Cleanliness at slaughter is extremely important, contributing to meat safety, consumer confidence, and minimising the potential risk to human health. Presenting clean livestock at the abattoir therefore benefits all stakeholders in the production chain, from the producer and FBO to the retailer and ultimate consumer.

EU Food Hygiene Regulations applied in the UK through the Food Hygiene Regulations (2006) outline the responsibility of the FBO to produce food safely by applying good hygienic practices and food safety management procedures, based on hazard analysis and critical control point (HACCP) principles. These regulations provide the hygiene control requirements for slaughter and state that all the slaughterhouse premises. Animals with hides, feathers, skins or fleeces posing an unacceptable risk of contamination to meat during slaughter also cannot be slaughtered for human consumption unless they are cleaned beforehand. The FBO must have an HACCP plan, in which they determine how they will meet the hygiene control requirements for slaughter.

In practice, this means that when livestock arrives at UK abattoirs it is assessed by the FBO to verify it is clean (eg an assessment of dirt and excrement on the animals, as well as wetness of the fleece or hide). The OV must also verify that acceptable standards of cleanliness are used by the FBO when sorting livestock so as not to compromise meat safety. If livestock does not meet the required standards of cleanliness, the FBO will specify in the HACCP plan how these standards will be met; depending on how wet or dirty the animals are, this can be through clipping, drying or leaving the animal until the end of the shift and/or slaughtering at a reduced speed. These measures can result in delays to the slaughter process and extra costs for both producers and FBO. Some abattoirs will also charge a fee when animals need to be clipped prior to slaughter to remove dirty wool or hair. The FSA highlights that presentation of unclean livestock at the abattoir can result in:

- additional costs where dirty animals are kept in lairage to be cleaned [or dried out] at the abattoir;
- cost of reduced slaughter line speed;
- reduced carcase value due to excessive trimming;
- reduced value of by-products eg leather or sheep skin; and
- loss of the entire carcase.^{51,52}

However, there is a lack of clarity in the legislation and guidance as to whether preparation and cleaning for slaughter should be undertaken on-farm by the producer or at the abattoir by the FBO. We consider this is a shared responsibility between the producer, haulier, livestock market and FBO.

⁵¹Food Standards Agency (FSA). [FSA Clean Beef Cattle for Slaughter: A guide for producers](https://www.food.gov.uk/sites/default/files/media/document/cleanbeefsaf1007%20%281%29.pdf), Available at: <https://www.food.gov.uk/sites/default/files/media/document/cleanbeefsaf1007%20%281%29.pdf>

⁵²Food Standards Agency (FSA) [FSA Clean Sheep for Slaughter: A guide for producers](https://www.food.gov.uk/sites/default/files/media/document/cleansheep0507%20%281%29.pdf). Available at: <https://www.food.gov.uk/sites/default/files/media/document/cleansheep0507%20%281%29.pdf>

For example, producers should present clean and dry livestock to the abattoir through ensuring appropriate diet, husbandry and housing prior to transport, and cleaning livestock where necessary. Hauliers should make sure animals are fit to travel, travel conditions are clean, and stocking density is appropriate for the species and size of animals. Should the livestock arrive dirty, the FBO should ensure they meet the required standards of cleanliness before being slaughtered for human consumption. There are several useful guidance documents to support both producers, hauliers, livestock markets and FBO in this shared responsibility (**see Annex B for more information**).

Cleaning livestock at the abattoir

When animals arrive at the abattoir dirty or wet, as outlined above, the FBO must ensure they meet the required standards of cleanliness before they can be slaughtered for human consumption eg. through pre-slaughter clipping, cleaning or allowing animals to dry.

In pigs, we recognise there are occasions where dirty animals are indicative of good welfare on-farm (eg from wallowing), or where it is not possible to clean them prior to arrival without causing additional distress. In these cases, we support the use of cleaning facilities in lairage, such as pig misting, which cleans animals, as well as minimising distress and regulating body temperature in hot weather.

However, it is important to recognise that pre-slaughter clipping and cleaning can act as a stressor for livestock that are not routinely handled. Therefore, where clipping and cleaning are carried out at the abattoir, the least stressful process should be used.

Live clipping in particular can also put stock handlers at risk of injury from larger animals. Live clipping should therefore only be carried out where there are appropriate handling facilities, safe working techniques, and trained, competent staff (further guidance for clipping is given in the Health and Safety Executive (HSE) Agriculture Information Sheet No 35 (Appendix 5)).

Depending on the type of dressing system (inverted or front leg suspension), dressing procedures should be such that the potential for carcase contamination is minimised. This can involve upwards or downward hide/fleece-pulling - hide-pulling can help to contain any remaining uncleanness.

Consistent approach to cleanliness

To drive hygiene standards and foster a consistent approach to the cleanliness of animals presented for slaughter, competent authorities, farmers unions, FBOs and retailers should be united in their message that animals will not be accepted for slaughter unless they are clean. These stakeholders should also continue to reiterate that presenting clean livestock at the abattoir benefits all stakeholders in the production chain, including the consumer.

The competent authorities (FSA, FSS and DAERA) should produce clear standards and guidance for farmers, hauliers and Food Business Operators to outline acceptable and unacceptable levels of cleanliness for animals that arrive at the abattoir to be slaughtered. We note that the FSA previously

holding of provenance and improve the planning and preparation of animals for transport and slaughter.

Recommendation 10: The Food Chain Information declaration should include a welfare component (based on outcome measures) as well as a recorded assessment of welfare on arrival to the abattoir and assessment of dead on arrival animals.

Handling and harvesting operations

Handling of livestock

The humane, safe and effective handling of livestock is an integral part of welfare at slaughter, with EU Regulation (EC) 1099/2009 on the protection of animals at the time of killing stating

handling, lairage, restraint, stunning and bleeding). Operational rules for slaughterhouses are set out in Annex III of EU Regulation (EC) 1099/2009 and the UK Welfare of Animals at the Time of Killing (WATOK) regulations^{59, 60, 61, 62, 63}.

From loading onto transport and unloading at the end of journeys, to moving, lairage

We therefore support passive handling systems that minimise the risk of pain, distress and injury to both the animals and the handler. We do not support the routine use of electric goads. Electric goads should only be used when absolutely necessary in line with current legislation.

Training and species-specific knowledge

Species-specific knowledge and skill of animal handlers are crucial to upholding the welfare of livestock during handling operations. Slaughterhouses should therefore employ staff with the appropriate knowledge and skills required for handling, restraining, stunning and killing each species slaughtered on the premises.

Those working in slaughterhouses must hold a species-specific Certificate of Competence (CoC) for each procedure they carry out, including handling, restraining, stunning or killing animals.

We encourage all those involved in the handling operations and slaughter facility design to familiarise themselves with, and adhere to, best practice to promote positive animal welfare (**See Annex B**).

We note that while comprehensive and valuable, UK guidance on handling

Recommendation 15: All of the UK administrations should introduce mandatory CCTV in abattoirs in all areas where live animals, or animals being slaughtered, are present with unrestricted access to real time and stored footage for OVAs.

To complement and promote the continuous improvement of skilled animal handling, we would welcome increased use of technology during handling operations to provide more opportunities to verify and observe handling practices. For example, CCTV on lorries for loading/unloading or body cameras on animal handlers. Further consideration would need to be given to who would have access to the footage and how this could be implemented to incentivise use eg. linking the use of technology to improve animal welfare with reduction in insurance premiums for hauliers and transporters.

Recommendation 16: There should be increased use of technology during handling operations to provide more opportunities to verify and observe handling practices

Handling facilities

Handling facilities (ramps, lairage, raceway and restraint) should be designed with species-specific needs in mind, informed by evidence to achieve positive health and welfare outcomes across species, and designed to minimise handling before slaughter (see species-specific needs section).

We support the general requirements for the layout, construction and equipment of slaughterhouses (including handling facilities, lairage facilities and restraining equipment) as set out at Annex II of EU Regulation (EC) 1099/2009 protection of animals at the time of killing and the UK Welfare of Animals at the Time of Killing regulations^{68, 69,70,71,72}

As a basic principle, there must be suitable handling facilities for all sizes of animal accepted into the abattoir, and where facilities are restricted to a certain species or weight range, FBOs should specify the weight and height range that their facilities can accept. Facilities or provisions for horned animals, especially those with wide horn spans, should also be provided where such animals are accepted for slaughter.

It is important to note that EC/1099/2009 Article 14 already requires Food Business Operators to submit at least the following to the competent authority:

- (a) the maximum number of animals per hour for each slaughter line;
- (b) the categories of animals and weights for which the restraining or stunning equipment available may be used;
- (c) the maximum capacity for each lairage area.

However, in the UK this legislation is only applied to new approvals of slaughterhouses, therefore the majority of premises have not submitted this information.

Recommendation 17: Where facilities are restricted to a certain species, weight or height range, Food Business Operators should specify the weight and height range that their facilities can accept to the competent authority, and make provision for horned animals where such animals will be accepted for slaughter.

Ramp, restraint and raceway design

To avoid distressing animals and facilitate handling, ramps, raceways and restraining systems should be designed with the following principles in mind:

Ensure loading and unloading ramps have a gentle incline and have side gates (preferably solid to prevent distraction)

⁶⁸ [The Welfare of Animals at the Time of Killing \(England\) Regulations 2015](#)

⁶⁹ [The Welfare of Animals at the Time of Killing \(Scotland\) Regulations 2012](#)

⁷⁰ [The Welfare of Animals at the Time of Killing \(Scotland\) Regulations 2012](#)

⁷¹ [The Welfare of Animals at the Time of Killing \(Wales\) Regulations 2014](#)

⁷² [The Welfare of Animals at the Time of Killing Regulations \(Northern Ireland\) 2014](#)

We recognise that the UK aquaculture sector has adopted several industry-led codes of practice and assurance scheme standards to protect fish welfare at slaughter^{97,98,99} [The Code of Good Practice from Scottish Finfish Aquaculture](#) and [RSPCA Assured scheme standards for Salmon and Trout](#). However, we note there is currently no detailed legislation to protect the welfare of farmed finfish at slaughter. Instead, provisions for farmed finfish in UK and EU legislation are limited to key principles,

Crowding

Stunning methods typically used in the UK

Below we set out the stunning methods typically used for different species in UK abattoirs. For more detailed information on how each stunning method works, [please consult the Humane Slaughter Association online guides](#).

Species	Typical stunning methods used in the UK	Stun or simple stun
Cattle	Penetrative captive-bolt device	Simple stun
	Head-only electrical stunning (Calves)	Simple stun
	Head to body electrical stunning (Jarvis box)	Simple stun
	Free-bullet firearm (Bulls)	

	Head only electrical stunning	Simple stun
	Cervical dislocation back up only.	Stun
Horses	Free-bullet firearm	Stun
	Penetrative captive-bolt device	Simple stun
Deer	Free-bullet firearm	Stun
	Penetrative captive-bolt device	Simple stun
	Head-only electrical stunning, not in common use	Simple stun
Llamas and Alpacas	Penetrative captive-bolt device	Simple stun
	Head-only electrical stunning	Simple stun
	Free-bullet firearm	Stun
Fish	Percussive stunning	Stun

UK Welfare of Animals at the Time of Killing regulations should therefore specify that reduction systems must be used for group stunning, and there should always be a minimum of slaughter operatives operating group stunning systems – one stunning and one shackling.

Recommendation 25: UK Welfare of Animals at the Time of Killing regulations should specify that reduction systems must be used for group stunning, and there should always be a minimum of two slaughter operatives operating group-stunning systems.

Monitoring effective stunning

There should be trained slaughterhouse staff and robust monitoring systems to verify effective stunning. After a stun has been applied operators should check for indicators of consciousness until the animal is dead to ensure that the animals have received an effective stun and are unconscious until death, or already dead depending on the stun method.

If an ineffective stun does occur, OV's are required to record the occurrence on the competent any doubt as to whether the stun has been applied effectively, operators should apply a repeat stun immediately to ensure the animal is rendered immediately unconscious and the stun has been effective **information**). Legislation requires a back-up stunning method to be immediately available for slaughter operatives, with EC 1099/2009 stating:

... -up [stunning] equipment is immediately available on the spot and is used in the case of failure of the stunning equipment initially used. The back-up method may differ from that first used.

As of December 2019^{108, 109, 110, 111}, all electrical stunning equipment in the UK (apart from electrical-waterbath stunners) must be connected to a device indicating the voltage and the current under load, positioned so the operator can clearly see it, and incorporate an audible or visible device indicating the duration of a stun application. In addition, gas stunning equipment for poultry and pigs must measure and continuously display the required gas concentration and give clearly visible and audible warning signals if the gas concentration falls below the required level (in accordance with Table 3 of Chapter I of Annex I of EC 1099/2009). Electrical-waterbath stunning equipment must be fitted with a device that indicates the electrical key parameters, volts, amperage and frequency. All electrical and gas stunning equipment must record the key parameters and these records must be retained for 12 months.

This means that each FBO that conducts electrical and gas stunning will have recorded evidence on parameters and concentrations used, as well as time of application, in addition to the data whic95.2 841.8ddadda6(h)2

**Number of inaccurate/ineffective stuns recorded as serious/critical in England and Wales
2010-19¹²**

<u>Year</u>	<u>Period</u>	<u>Poultry</u>	<u>Cattle</u>	<u>Pigs</u>	<u>Sheep and Goats</u>	<u>Total</u>
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Recommendation 30: The UK Government should establish a mandatory system for regular approval and quality assurance for stunning/killing equipment to ensure continuing suitability for the purpose intended.

Data capture and reporting

The FSA and FSS capture data on slaughter methods across species, including

each method of slaughter by species, and total number of animals slaughtered by each method;

the incidence of animal welfare non-compliance;

the total number of animals that receive an effective stun;

the total number of animals that receive no stun;

the total number of animals that receive an ineffective stun (ie. demonstrate several indicators of consciousness);

data on the effectiveness and quality of exsanguination

the end-destination of stunned and non-stunned meat in the UK (ie. if non-stun meat is sent for wider consumption within the UK market); and

the total amount of stunned and non-stunned meat exported and where it is exported to.

Recommendation 31: The UK governments should commission the FSA, FSS and DAERA to produce and publish annual figures on the incidence of animal welfare non-compliance, slaughter methods, the incidence of effective and ineffective stunning, effectiveness and quality of exsanguination, and end-destinations with a routine publication date.

Stunning methods: Species-specific considerations

Across all species, the development of effective, humane and economically viable stunning methods should be incentivised by government and industry to improve welfare at slaughter.

With this in mind, we have considered the welfare implications of existing stunning methods across species and identified several key areas that should be considered to improve welfare and the effectiveness of stunning.

Recommendation 32: The development of effective

centre of the head which may prevent an effective application. Larger adult pigs should therefore receive an electrical stun followed by cardiac arrest or bleeding, or be killed with a free-bullet firearm or shotgun¹²¹.

Head-only simple stunning and head-to-back electrical stunning of sheep, goats and pigs

The effectiveness of head-only simple stunning and head-to-back electrical stunning in unrestrained animals is largely dependent on the skill of the operator in positioning the electrodes (handpiece or scissor tongs

Recommendation 37: Research should be undertaken by government and industry to develop less aversive gas stunning methods with the aim of phasing out current aversive gas stunning methods for pigs.

Alternative methods for stunning pigs

In terms of less-aversive gas stunning methods, existing evidence also suggests that stunning using inert gases such as argon (or nitrogen) to stun pigs should be explored. This evidence has demonstrated that pigs, chickens and turkeys showed no aversion to inhalation of argon.^{131,132} However, exposure to argon for five minutes or less can result in rapid recovery, and UK legislation

Stork and Meyn, and the Marel Atlas system are currently being used to stun poultry at plants in the UK.

We would welcome further scientific evidence to demonstrate the point at which birds are rendered unconscious before exposure to aversive concentrations of carbon dioxide in the LINCO gas stunning system. We note the FAWC

Captive-bolt stunning of horses is generally accepted as an effective stunning method, provided there

Commercially caught decapods and cephalopods

Evidence indicates that decapods (eg lobsters, crabs) and cephalopods (eg octopus, squid) are sentient, and experience pain and distress.^{149, 150, 151, 152, 153, 154, 155, 156} We therefore support the principle that commercially caught decapods and cephalopods should be stunned before slaughter.

At present, EC Regulation 1099/2009 and UK Welfare of Animals at the Time of Killing regulations do not cover decapods or cephalopods. It is therefore legal to slaughter these animals (particularly decapods) without first rendering them insensible to pain and with methods that are likely to cause pain and suffering^{157,158}. Such methods include:

- Placing live decapods in cold water and heating the water to boiling point.
- Placing live decapods into hot or boiling water.
- Placing live marine decapods in fresh water and drowning
- Live carving and dismemberment

Electrical stunning of decapods may represent an effective, humane and commercially viable option for stunning decapods in restaurants or commercial slaughter processing plants. Scientific evidence suggests that electrical stunning is an effective stunning method^{159,160,161,162}; however, we note that further research on electrical methods is needed to indicate the minimum effective parameters for different types and sizes of decapods.

We would also welcome the development of effective, humane and commercially viable methods of stunning cephalopods before slaughter. We are aware that the [Humane Slaughter Association \(HSA\) is making over £1.7 million available to support scientific research to improve the welfare of farmed finfish, decapod crustaceans and/or cephalopods during slaughter](#), and look forward to the results of this research.

Recommendation 52: There should be further research into electrical stunning methods to determine the minimum effective parameters for different types and sizes of decapods.

¹⁴⁹European Food Safety Authority, 2005. [used for](#) Available at:

Recommendation 53: There should be further research to develop effective, humane and commercially viable methods of stunning cephalopods.

Recommendation 54: Once effective, humane and commercially viable methods of stunning decapods and cephalopods are developed, the UK governments should include the stunning of commercially caught decapods and cephalopods alongside general welfare protections at slaughter in UK Welfare of Animals at the Time of Killing regulations.

Rabbits

The number of rabbits killed commercially for human consumption in the UK is small. At the time of writing, the FSA currently has no slaughter premises approved to slaughter rabbits. We are aware there are a number of holdings with less than 100 rabbits registered with APHA, which may kill a low throughput of these rabbits on-farm under a WATOK licence.

There appears to be a disparity between the quantity of rabbit meat sold in the UK each year (understood to be c.200-300 tonnes) and the fact there does not appear to be a commercial source for production of this quantity of meat in the UK. We would therefore welcome greater clarity on how much rabbit meat the UK imports and countries of origin.

Rabbits slaughtered commercially in the UK are typically stunned using percussive blow stunning, head-only simple electrical stunning or captive-bolt stunning. The [EFSA opinion on stunning methods and slaughter of rabbits for human consumption](#) considers the effectiveness and potential welfare hazards of these methods.

Percussive blow stunning

Under t

may be routinely stunned using a non-mechanical percussive blow to the head eg. a manual

Non-stun slaughter, improved regulation, and the acceptance of stunning

Derogation to permit non-stun slaughter

While it is a statutory requirement for all animals to be effectively stunned before slaughter in the UK, EU Council Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing allows Member States to apply a derogation to permit slaughter without stunning for slaughter in accordance with religious rites. The UK administrations apply this derogation in their Welfare of Animals at the Time of Killing regulations and permit non-

For meat to be considered Halal, Islamic scholars must therefore be satisfied that the animal is alive

unions, UK governments, Islamic scholars and Halal certification bodies to develop and implement a quality assurance framework for Muslim consumers. The framework should certify specific recoverable stunning methods to confirm that these methods do not result in death before the point of exsanguination. A similar framework has been successfully implemented in New Zealand and provides assurances that recoverable stunning does not result in death for small ruminants.¹⁷⁹ This protocol allows a competent authority to demonstrate that after a head-only simple stun has been applied the sheep or goat remains unconscious (and insensible to pain), but is able to demonstrate indicators of life, such as rhythmic breathing and an audible heartbeat.

Any UK assurance framework of this kind would require robust ethical and legal consultation before it is progressed and implemented. It would also require strict control through a clearly defined protocol that stipulates acceptable indicators of life (that pose no welfare compromise), frequency of use, number of animals to be used, persons to be present, as well as veterinary oversight through the competent authority. The use of video footage to help support the protocol in its aim of providing assurance, and ultimately help reduce frequency of use of the protocol, should also be considered as part of any proposals. Further, the presence of prominent Islamic scholars may be useful in disseminating results of the demonstration to other scholars thereby reducing the frequency of demonstration.

Recommendation 60: The veterinary profession should engage positively with all stakeholders, including Islamic scholars and Halal certification bodies, to provide evidence-based information on stunning methods and animal welfare, and promote the acceptability of stunning in Halal production.

Consumer education and food labelling

Directing consumers towards higher welfare products

Consumers have a right to understand the provenance of the food they are purchasing and make an informed choice as to how to direct their spend towards higher animal health and welfare products, based on their own ethical and budgetary priorities.

The veterinary profession has a key role to play by informing and educating all members of the public with regard to the value and provenance of animal-derived food. We therefore encourage consumers to purchase farm-assured produce that guarantees animal-derived products have met independently certified animal health and welfare standards at each stage of the supply chain, including welfare at slaughter and pre-slaughter stunning.

As part of this, we recognise we have a responsibility to assist members to understand different farm assurance schemes and to signpost the public, in a professional and ethically justifiable way, towards those that promote higher animal health and welfare. We have therefore produced a [position on the value of UK farm assurance schemes](#) and a [supporting #ChooseAssured: UK Farm Assurance schemes infographic](#), which sets out BVA priorities for farm animal welfare and shows if these are addressed in different UK farm assurance scheme standards.

Recommendation 62: The veterinary profession should continue to promote the benefits of properly val
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Annex A Glossary of terms

Abattoir/ Slaughterhouse	any establishment used for slaughtering terrestrial animals which falls within the scope of Regulation (EC) No 853/2004.
Competent authority	the central authority competent to ensure compliance with the requirements of the law or any other authority to which that central authority has delegated that competence;
Crowding	Crowding is the term given to the process in which the area available to the fish is reduced, usually in order to facilitate the removal of fish from the pond or cage.
Distress	use is widely debated within animal welfare science literature. ^{180, 181} Based on the terminology used in UK Welfare of Animals at the Time of Killing regulations and EC 1099/2009 on the protection of animals at the time of killing, for the purposes of this
Farm Animal Welfare Committee (FAWC)	FAWC advised the Department for Environment, Food and Rural Affairs (Defra) and the devolved administrations in Scotland and Wales on the welfare of farmed animals. FAWC was renamed to Animal Welfare Committee (AWC) on 1 October 2019.
Food Business Operator (FBOs)	any natural or legal person having under its control an undertaking carrying out the killing of animals or any related operations falling within the scope of this Regulation.
Harvest station	establishment used for slaughtering fish.
Harvesting	Killing of fish, can often be split into five stages: grading, fasting, crowding, transport and killing.
Lairage	stalls, pens, covered areas or fields associated with or part of slaughterhouse operations used to keep animals.
Pithing	Physical destruction of the brain to ensure rapid death following captive-bolt stunning. Pithing involves inserting a flexible wire or polypropylene rod through the hole in the head made by a penetrative captive-bolt. The rod is then thrust towards the tail through the brain to the level of the brainstem and, if it is long enough, into the spinal cord. It is then slid back and forth to cause maximum damage to the brain and upper spinal cord. ¹⁸²
Recoverable stun	A recoverable stun renders the animal unconscious and insensible to pain but does not kill the animal before neck cutting. Recoverable stunning gives confidence that the animal is not dead at the point of slaughter as it would fully recover should bleeding not occur to elicit brain death.

Slaughter

¹⁸⁰ Broom, Donald & Johnson, Ken., 2019. Stress and Animal Welfare: Key Issues in the Biology of Humans and Other Animals. 10.1007/978-3-030-32153-6.

¹⁸¹ Appleby, M, 2018. Animal Welfare, 3rd Edition. Cabi Publishing.

¹⁸² Humane Slaughter Association (HSA). Pithing. Available at: <https://www.hsa.org.uk/bleeding-and-pithing/pithing>

Annex B Useful guidance documents to promote positive animal welfare during the slaughter process

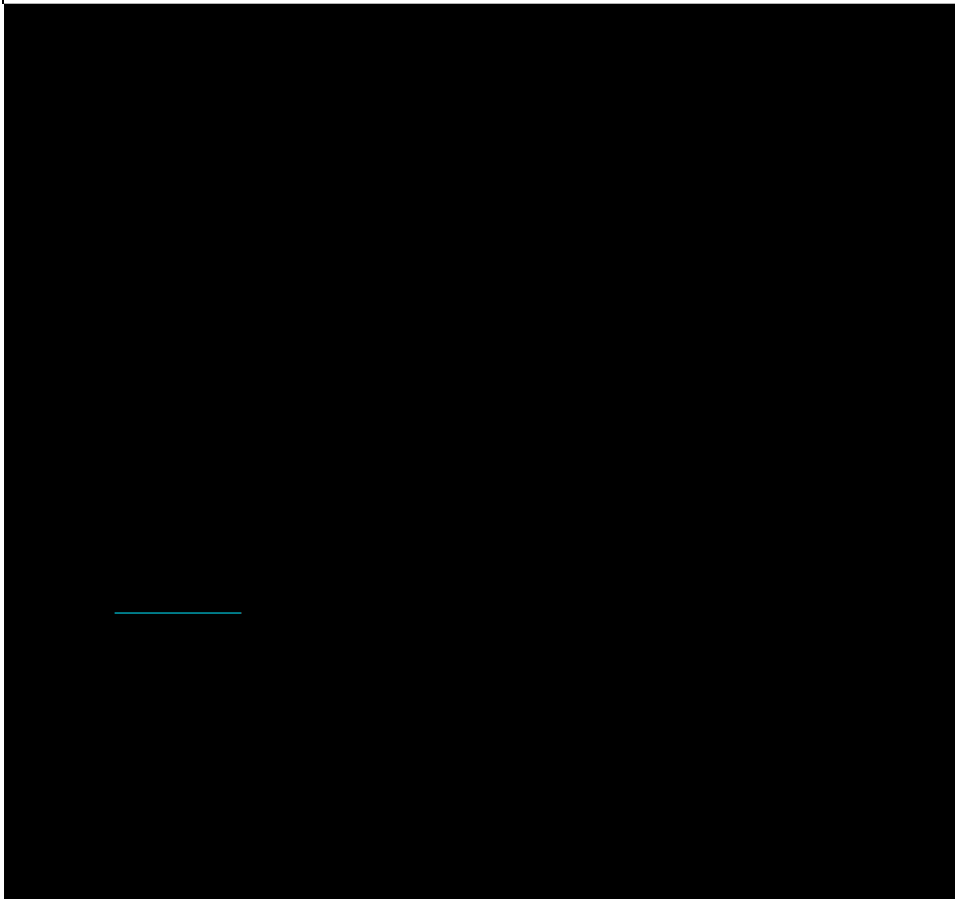
All those involved in the handling of animals during the slaughter process should familiarise themselves with, and adhere to, best practice to promote positive animal welfare.

<p>Transport guidance</p>	<p>Defra Welfare of animals during transport: Guidance on implementation in the United Kingdom Practical Guidelines to Assess Fitness for Transport of Equidae European Commission Animal Transport guides (for sheep, cattle, poultry, pigs and horses) Defra has also published species-specific guidance to supplement these general rules, including:</p> <ul style="list-style-type: none"> - Transporting horses and ponies - Transporting cattle - Transporting pigs - Transporting sheep - Transporting goats - Transporting poultry <p>Humane Slaughter Association</p> <ul style="list-style-type: none"> - Transport of farm animals and horses - Transport of poultry
<p>Handling operations guidance</p>	<p>Defra Red meat slaughterhouses (including horses): unloading, handling and holding animals Defra Red meat slaughterhouses (including horses): restraining, stunning, killing animals Defra White meat slaughterhouses: unloading, handling and holding, restraining, stunning, killing European Commission fact sheets on handling and restraining livestock European Commission loading and unloading, handling guidance (for sheep, cattle, poultry, pigs and horses) HSA guidance on the Humane Handling of Livestock HSA guidance on the catching and handling of poultry (including turkeys) FSA Best Practice Guidelines for group stunning systems (5.8 MB PDF) Temple Grandin principles of low stress restraint HSA guidance on humane harvesting of farmed fish, RSPCA Assured standards for salmon and trout The Code of Good Practice from Scottish Finfish Aquaculture</p>
<p>Facilities guidance (handling facilities, lairage design, raceway design, restraining equipment)</p>	<p>Temple Grandin design of restraint systems Temple Grandin - Livestock Handling Systems, Cattle Corrals, Stockyards, Lairages and Races Temple Grandin Non-stick flooring for livestock handling HSA guidance on the Humane Handling of Livestock HSA Humane Handline of Livestock Design Checklist for food business operators who are thinking about designing or improving</p>

Harvesting of fish guidance

[Humane Slaughter Association guidance on the Humane Harvesting of Fish](#)
[RSPCA Assured standards](#) for salmon and trout
[The Code of Good Practice from Scottish Finfish Aquaculture](#)

Effective stun application guidance



Annex C - BVA Position on the welfare of livestock during transport

Movement of animals is an intrinsic part of livestock¹⁸³ keeping, production and distribution of genetics to provide the stock necessary to feed the rest of the world.¹⁸⁴ The scale will vary widely from local area movements, to pastures, markets, new premises to those of greater distance such as regional, national and long-distance international moves.

Any movement of animals will have a potential impact on their health and welfare. Whatever the type and scale of movement, the welfare of animals must be prioritised with the aim of reducing the impact of the movement as far as is reasonably possible.

In order to achieve this, all those involved with moving animals must understand what is required of them in law, receive certified training and be encouraged to follow sector-specific good practice guidelines.

Wherever possible, and paying due regard to scientific evidence regarding the relationship between journey times and welfare outcomes, animals to be slaughtered for food should be slaughtered as close to the point of production as possible.¹⁸⁵¹⁸⁶¹⁸⁷¹⁸⁸ No animal should be knowingly exported to a destination with unknown welfare standards or exported then raised in systems banned in this country due to welfare considerations. Neither should animal product from such animals be re-imported.

BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders¹⁸⁹¹⁹⁰ and Regulations¹⁹¹¹⁹²) that are in force to protect the health and welfare of livestock during transport.¹⁹³ It is essential that there are a well-defined set of animal health welfare standards that must be met for the **entirety** of the journey of animals being transported in this country and abroad. These minimum standards should be the same for all animals no matter the purpose of the export (for example if it is for breeding or fattening), in line with current legislation.

¹⁸³

animals and equidae.

¹⁸⁴ In the poultry sector live chicks are exported, then reared and slaughtered in other countries. Whilst it is paramount that high welfare destination conditions are ensured for these chicks, it is also important to recognise that the exporting of these chicks is an important practice to ensure that countries can trade excess and deficit stock numbers to manage oversupply and ultimately avoid the destruction of chicks from breeding lines that have no market in this country.

In addition, in the poultry sector day-old chicks are able to survive on their yolk sac reserves to support them during the first 72 hours of life.¹⁸⁴ Therefore, they may be more amenable to transport with the provision of appropriate environmental controls as opposed to adult animals where transport can be a more significant risk to stress, health and welfare.

Further, the UK is a centre of excellence in respect of poultry genetics and pedigree stock, ensuring the provision of genetics to feed the world – valuable both in terms of production and in terms of human and animal health.

¹⁸⁵ Defra: Transcontinental road transport of breeder pigs - effects of hot climates

¹⁸⁶ Defra: Epidemiological study to identify acceptable maximum journey lengths for pigs whilst maintaining welfare

¹⁸⁷ Defra: Review to appraise the evidence for acceptable temperature envelopes for horses, sheep, pigs, cattle and goats during transport

¹⁸⁸ Mitchell, M.A. & Kettlewell, P.J.(2008) Engineering and design of vehicles for long distance road transport of livestock (ruminants, pigs and poultry). *Veterinaria Italiana*, 44 (1), 197:209

¹⁸⁹ [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

¹⁹⁰ [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

¹⁹¹ [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

¹⁹² [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

¹⁹³ As set out in

BVA welcomes legislative improvements to safeguard the welfare of animals during transport. Any improvements should be evidence-based and informed by a welfare outcomes approach. However, it is important to emphasise, that any legislative improvements are only beneficial if they are effectively enforced.

To build on existing legal requirements, our specific recommendations to improve the health and welfare of livestock during transport are set out below:

Recommendation 1: In order to improve welfare outcomes before, during and after transport, the implementation of current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders¹⁹⁴¹⁹⁵ and Regulations¹⁹⁶¹⁹⁷) should be improved to ensure that requirements relating to appropriate transport conditions and fitness to travel of animals are adequately enforced.

Recommendation 2: Any legislative improvements to safeguard the welfare of animals during transport must be evidence-based and informed by a welfare outcomes approach.

Recommendation 3: Any proposals to improve welfare during transport should consider all forms of transport and address the issue of welfare before, during and after journeys.

Recommendation 4: Any proposals to improve welfare during transport must give due consideration to how improvements would work for all of the UK administrations and the impact of unintended consequences on animal welfare and industry across the UK.

Recommendation 5: Any proposals to improve welfare during transport for horses, and therefore may not be afforded an adequate level of care, should be protected.

Recommendation 6: When considering legislative improvements to safeguard the welfare of animals during transport, consideration should be given as to how to address all determinants of potential welfare compromise. These may be complex and potentially conflicting.

Recommendation 7: Consideration should be given to the complex species-specific requirements for transport design, vehicle condition and hygiene, as well as stocking density to achieve optimal health and welfare outcomes. We strongly support the implementation of recommendations regarding improvements to the quality of transport vehicles as set out in the [2011 EFSA Scientific Opinion concerning the welfare of animals during transport](#).

Recommendation 8: All drivers and farmers intending to transport livestock in connection with an economic activity must receive certified training (as is already required of hauliers), with sound knowledge of how aspects of driving can directly impact on the welfare of animals being transported. This may be linked to a future system of public money for public goods.

Recommendation 9: Attendants at rest points should have similar responsibility for the animals under their care as hauliers and should have received appropriate certified training in animal handling.

Recommendation 10: Appropriate veterinary care must be available at rest points in order to recognise and assess any potential welfare issues, manage any negative welfare outcomes and ensure the provision of emergency slaughter if needed.

Recommendation 11: All drivers and farmers intending to transport livestock in connection with an economic activity must receive certified training on the factors that make an animal fit or unfit for transport. This may be linked to a future system of public money for public goods.

Recommendation 12: The welfare of animals pre-, during and post-transportation should be monitored under the direction of a veterinary surgeon in order to manage any potential negative welfare outcomes. Further consideration should be given to implementing outcomes-

¹⁹⁴ The Welfare of Animals (Transport) (England) Order 2006

based approaches to measure animal welfare during transport eg. sensors to measure temperature, exact timings and animal welfare indicators.

Recommendation 13: Animals should not be exported to countries for non-stun slaughter. BVA is clear in its [view that all animals should be stunned before slaughter to render them insensible to pain.](#)

Recommendation 14: Wherever possible, and paying due regard to scientific evidence regarding the relationship between journey times and welfare outcomes, animals to be slaughtered for food should be slaughtered as close to the point of production as possible.

Recommendation 15: No animal should be exported to a destination with unknown welfare standards or exported, then raised in systems banned in this country due to welfare considerations. Neither should animal product from such animals be re-imported.

Recommendation 16: Consideration should be given to providing more opportunities for farm animal slaughter as close to the point of production as possible with appropriate animal health and welfare safeguards.