

‘Draft Scottish Executive Response to recommendations contained in the Farm Animal Welfare Council (FAWC) Report on the Welfare of Animals at Slaughter (Red-meat Animals)’

Analysis of responses to Consultation

November 2004

Introduction

The Farm Animal Welfare Council (the UK and devolved Government’s independent advisory body on animal welfare matters) published a report on the welfare of red meat animals at slaughter and killing on 10th June 2003. After review and consideration, the Scottish Executive produced a consultation document: “Draft Response to the Farm Animal Welfare Council (FAWC) Report on the Welfare of Animals at Slaughter (Red – Meat Animals)”. Over 348 consultation letters were issued on Thursday 8 April 2004, not only to the industry, but also to religious, welfare, veterinary and consumer groups. This was because some of the recommendations in the FAWC report related to the issue of slaughter without pre-stunning of animals (religious slaughter) which is permitted under EU and domestic legislation.

However, only 15 responses were received by the closing date of 2nd July 2004. A list of the respondents can be found in Annex A. Of these respondents: 1 requested that their response be kept confidential; 3 did not fill in the Respondee Information Form (and, therefore, were considered public); and 5 made a Nil response, or nearly so.

Based on the replies the reaction to the consultation was generally positive. The acceptance of FAWC recommendations was seen as a step forward in improving animal welfare; and where there was a partial acceptance by the SE, this was generally seen as reasonable. Specific references to recommendations were usually made when the SE had not accepted, or only partially accepted a FAWC recommendation. The Executive will give careful consideration to the comments received when considering revisions to the existing welfare code and possible changes to the existing legislation. Listed below is a summary of the responses received to individual recommendations.

RESPONSES TO THE CONSULTATION

Recommendation 1 (Para 25):

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

General agreement with the SE's acceptance of this recommendation. There was a request that scheduling be kept flexible, and a query about where the responsibility for ensuring compliance would lie.

Recommendation 2 (Para 26):

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

No strong objections to the SE response, which was described as reasonable and allowing flexibility. One response suggested that means of alleviating discomfort such as fans for ventilation could be introduced, or a maximum cut-off time. Another response noted that the roles and responsibilities were not clear, and presumably therefore it was difficult to respond.

Recommendation 3 (Para 31):

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

No objections were made, but it was noted this might burden small enterprises. One response suggested that the SE make funding available for upgrades like these. Another response stated that a phasing-in period would be essential, as would flexibility of gradients so that individual ramp sites could be accommodated.

Recommendation 4 (Para 32):

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

Two responses suggested that a central resource centre would be very useful; for instance a SEERAD (or Defra) website with links to relevant information.

Recommendation 5 (Para 36):

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

A number of responses supported this FAWC recommendation. Suggestions were made that if Recommendations 1 and 6 were altered slightly and followed efficiently there would be no difficulty with this Recommendation.

Recommendation 7 (Para 38):

Local Authority enforcement officers should undertake regular checks on livestock transporters at slaughterhouses.

Respondents commented that this was one of several points that highlighted the issue of adequate resources.

Recommendation 9 (Para 43):

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

It was suggested that the emergency contacts listed should include those of a Muslim slaughterman where animals were due for slaughter without pre-stunning.

Recommendation 12 (Para 52):

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

It was suggested that the fact there was a FAWC recommendation for a formal review of the structural approval of slaughter houses implied that the current arrangements were inadequate, and that this may need to be looked into.

Recommendation 13 (Para 55):

When designing new slaughterhouses or re-designing existing ones, operators must ensure compliance with the legal requirement that the place of slaughter or killing should be sited so as to minimise the handling of the animal.

General agreement. It was suggested that any design should ensure that no animal see blood, carcasses, or any part of the slaughter process.

Recommendation 14 (Para 59):

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

The comment was made that 'a more positive response to flooring materials' would be helpful. It was noted that the SE's idea of linking research into this with research into floor materials used on farm and in markets was reasonable.

Recommendation 15 (Para 60):

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

One response suggested that suitable training for animal handlers would be useful in lessening numbers of falls. Another suggestion was that flooring of an appropriate standard would lessen the chance of falls due to poor handling or poor design. The FAWC idea of a scoring system was seen as a useful way of tracking improvements and identifying problem areas by some, even if it could not be used in comparing facilities.

Recommendation 17 (Para 68):

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

Research into noise levels would give any SE guidance more authority.

Recommendation 19 (Para 76):

Government should provide advice on optimum schedules for feeding and watering prior to slaughter, taking into account the travelling and marketing time animals may have undergone.

One response was that an alternative to feeding schedules, one with a case by case basis, could be looked into. Another was that the elements referred to in the SE response could be researched, this would relate to the effects of compounded stress.

Recommendation 20 (Para 77):

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

It was suggested that the enforcement methods should be examined.

Recommendation 21 (Para 79):

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

Support was given to the FAWC recommendation, It was noted that the SE response seemed to be more like partial acceptance, rather than rejection, of it.

Recommendation 22 (Para 82):

Government should issue guidance to operators on the effects of mixing of livestock in slaughterhouses

The mixing of livestock is important to the Muslim community when it comes to the mixing of sheep, goats and cattle with pigs. It was noted that this was reflected in Recommendation 23.

Recommendation 25 (Para 89):

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

There were a couple of queries about how the monitoring of field lairages would take place if they did not come under the curtilage of slaughterhouses.

Recommendation 27 (Para 95):

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

Two responses suggested that a central resource centre would be very useful; for instance a SEERAD (or Defra) website with links to relevant information.

Recommendation 29 (Para 102):

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

Support was given to the FAWC suggestion. Various methods of encouraging the cleaning of livestock presented for slaughter were made. It was also suggested that if a supplier consistently presented dirty stock, the OVS should make enquiries, in case this was a sign of a deeper problem. However it was also noted that accepting dirty stock was the decision of the slaughterhouse operator.

Recommendation 33 (Para 108):

Electric goads should only be used in exceptional circumstances.

A request was made that 'exceptional circumstances' be defined. Another response stated that the SE should take the lead, rather than waiting for Europe to take action.

Recommendation 34 (Para 109):

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

It was suggested that SE begin this, rather than wait for Europe to take action.

Recommendation 35 (Para 113):

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

Two responses supported the acceptance of horned cattle. It was suggested that a change in requirements take the form of guidance or advice only. It was accepted that cattle with unhealed wounds should not be presented for slaughter.

Recommendation 36 (Para 118):

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

General agreement. It was suggested that any design should ensure that no animal see blood, carcasses, or any part of the slaughter process.

Recommendation 37 (Para 119):

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

Two responses suggested that a central resource centre would be very useful; for instance a SEERAD (or Defra) website with links to relevant information.

Recommendation 38 (Para 120):

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

It was noted that animals might experience stress from their reluctance to step onto an angled or stepped floor. The suggestion was made that FAWC do further research. There was agreement with the SE response that there were dangers and difficulties attached to level floors. Several respondents said that further research should be done.

Recommendation 39 (Para 121):

Legislation that requires stunning boxes to be fitted with some device that restricts the movement of the animal's head must be enforced by the MHS.

It was suggested that further research would be helpful. For slaughter without pre-stunning, it was suggested that the restraining pens (not stunning boxes) could be designed for minimising animals' distress and for facilitating a direct, single incision of the neck. Another suggestion was that the SE make a fund available for upgrades like these.

Recommendation 43 (Para 134):

Animals must never be left waiting in restrainers. In the event of a breakdown they should be able to be evacuated or killed in situ.

It was noted that this was not relevant for religious slaughter. However, it was agreed that in the interests of animal welfare extended times in restrainers were undesirable.

Recommendation 44 (Para 138):

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

Two responses suggested that a central resource centre would be very useful; for instance a SEERAD (or Defra) website with links to relevant information. It was suggested that SE could provide resources to establish these systems. Also if the SE did not wish to provide funding, it could be an advocate of it.

Recommendation 46 (Para 143):

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

The setting of minimum standards for equipment was recommended, and the SE was urged to lobby for an EU-wide approval scheme.

Recommendation 49 (Para 150):

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

It was suggested that monitoring of stunning equipment should become a legal requirement. It was also suggested that slaughterhouses' records of killing procedures be open to viewing by religious slaughter supervisors.

Recommendation 51 (Para 153):

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

It was suggested that any killing be done in an enclosed area, out of sight of other animals.

Recommendation 52 (Para 160):

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

Support was given to the FAWC recommendation.

Recommendation 56 (Para 178):

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

It was suggested that any guidance should be the responsibility of the government and should be based on objective science.

Recommendation 57 (Para 189):

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

This was opposed, on the basis that current laws ensure that restraining pens in use are effective. There was also an objection to SE response linking the ideas of a post-cut stun (Recommendation 62) and the redesign of restraining pens. It was also suggested that the views of religious leaders and slaughter supervisors be taken into consideration by the government.

Recommendation 58 (Para 192):

The legislation prohibiting the lifting of sheep by the fleece should be enforced by the OVS.

It was suggested that any incident could be recorded so action might be taken if necessary.

Recommendation 59 (Para 193):

Alternatives to manual restraint methods for sheep should be explored by the industry for use at slaughter without pre-stunning.

One suggestion was that any alternative methods be ones that would not interfere with religious methods of slaughter. Another suggestion was that if a satisfactory system was developed, it should be made compulsory.

Recommendation 60 (Para 197):

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

The majority of respondents agreed with this recommendation; there was one objection – stating that the reasons behind this had been misinterpreted. It was suggested that any slaughter without pre-stunning take place with an OVS present.

Recommendation 61 (Para 201):

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

Majority of respondents agreed that this was an important and difficult issue. Objections were made: to the SE's acceptance of the report's conclusion that animals slaughtered without pre-stunning 'experience significant pain and distress'; on the grounds that if this was the case the SE's reasons for rejecting the recommendation were inadequate; and because the religious slaughter method was humane and caused near instantaneous unconsciousness, there was little pain and distress.

It was suggested that the SE look at the example of New Zealand; electric stunning means nothing enters the body cavity and that was the objection to stunning given by the majority of those supporting religious slaughter. Others stated their belief that human rights did not cover causing animals unnecessary pain. The economic factor was not seen as justification for a practice that could be considered inhumane continuing within the UK. If slaughter without pre-stunning were to continue, it should be in the presence of an OVS. It was suggested that the SE should work to find a solution acceptable for the continuation of religious slaughter, and also to fulfil animal welfare needs.

Certain respondents were pleased that Human Rights had been taken into consideration. There was an objection to the use of economic considerations as justification, when they were a consequence.

Labelling received general support, although various concerns were put forward. These were that labelling should not be pejorative or critical of religious slaughter methods; that religious slaughter groups be consulted as they have already done work in this direction; and that if labelled meat was not consumed, the welfare 'cost' of individual animals would increase.

Recommendation 62 (Para 203):

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

Respondents were divided on this recommendation. Again there was a recommendation that SE look into New Zealand's example. Respondents asked that sheep be included, and, in principle, there was agreement that the cut-stun time should be as short as possible.

Recommendation 63 (Para 210):

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

The recommendation was supported, and especially the 15 seconds maximum time, in one response, along with Recommendation 64. Another respondent objected, opposing killing being done in the sight of any other animal, whether con-specifics or not.

Recommendation 64 (Para 211):

Government's code of practice should set out targets for stun to bleed times for all species and for the range of stunning and killing methods currently in use.

Support was given to this by one response, along with Recommendation 63.

Recommendation 65 (Para 213):

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

It was noted that religious slaughter practices require the cutting of the oesophagus. There would also be practical difficulties in cutting both arteries, and leaving the oesophagus intact in abattoir conditions.

Recommendation 66 (Para 214):

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

It was suggested that the cutting of the thoracic arteries should become part of legislation, not just guidance.

Recommendation 70 (Para 240):

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

The SE response was seen as reasonable, it was noted that research would be useful here, and the comment was made that a redesigning of pens so that it could be possible to slaughter deer by religious methods would be welcome. The suggestion was made, as at other recommendations, that a fund for these kinds of upgrades, provided by the SE, would be helpful for small enterprises.

Recommendation 73 (Para 249):

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

Responses suggested that the creating of a separate category for ratites, under WASK regulations, would be the best way forward.

Recommendation 80 (Para 274):

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

It was noted that compulsory supervised training in religious slaughter is already in place for Muslim slaughter men. The suggestion was made that SE issue standard guidance to all OVS staff.

Recommendation 81 (Para 275):

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

Support was given to a 3-5 years assessment by one respondent. However it was proposed that assessments should be done by the OVS.

Recommendation 82 (Para 278):

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

One response supported the FAWC recommendation. It was noted that the SE response did not cover the category of 'field professionals' mentioned in the recommendation.

Recommendation 87 (Para 289):

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

It was suggested that instead, the SE should put regulations like the Welfare of Farmed Animals Regulations 2000 into place over operators.

Recommendation 88 (Para 290):

The AWO course operators should consider developing a system for formal assessment.

It was suggested that formal assessment might be done by OVS.

Recommendation 92 (Para 301):

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

There was some support for the idea of a CPD programme. It was also suggested that the issue of infrequent attendance might be solved by a flexible structure; this could be useful for both OVS and MHS inspectors.

The comment was also made that an action plan for constructing new rural slaughterhouses, and improving existing ones, would change the distances that animals have to travel to slaughter. This was seen as the most pressing animal welfare issue. New slaughterhouses in rural areas would also benefit local economies.

ANNEX A: RESPONDEE LIST

Name	Organisation
Dr Mandy Haggith, Secretary	Scottish Green Party
Mr Andrew C Gilchrist, Senior EHO	Aberdeen City Council
Ms Trisha Shiels, Administrative Manager	Perth and Kinross Council
Mr Andrew F Stewart, Clerk of Faculty	Faculty of Advocates
Mr Donaldson, Executive Manager	Scottish Association of Meat Wholesalers
Mr Colin Morgan	Scottish Centre for Animal Welfare Sciences
Mr William Rae, Honorary Secretary	Association of Chief Police Officers in Scotland
Mr Jim McDonald, Research Officer	Scottish Police Federation
Mr Nigel Miller	National Farmers Union of Scotland
Miss Jane C Hern, Registrar	Royal College of Veterinary Surgeons
Professor Margaret Gill	Macaulay Land Use Research Institute
Mr Peter Stevenson, Political Advisor	Advocates for Animals
Ms Leah Granat, Public Affairs Officer	Scottish Council of Jewish Communities
Mr Michael Flynn, Superintendent	Scottish Society for the Prevention of Cruelty to Animals
Mr Nizar Boga Chief Executive	The UK Halal Corporation Ltd

ANNEX B: DISTRIBUTION LIST

ANNEX C: CONSULTATION PAPER AND COVERING LETTER

ANNEX D: CONSULTATION RESPONSES

Copies of the distribution list, the consultation paper and covering letter, and all the responses received to the consultation (except those where the individual or organisation requested confidentiality) are placed in the Scottish Executive library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4552). The consultation paper and covering letter can also be found on the Scottish Executive website at <http://www.scotland.gov.uk/consultations/agriculture/fawc1.pdf>.