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Rural Development Sub-Committee
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Dear Mr Jones

WELSH ASSEMBLY GOVERNMENT RURAL DEVELOPMENT SUB-COMMITTEE INQUIRY INTO ANIMAL WELFARE AND MEAT HYGIENE

The Farm Animal Welfare Council has produced two recent Reports on the Welfare of Farmed Livestock at Slaughter or Killing: Parts One and Two on Red Meat Animals and White Meat Animals respectively (2003, 2009). Amongst many other recommendations these reports discussed and made recommendations on aspects of surveillance and enforcement in slaughterhouses aimed at improving the welfare of farmed animals at slaughter.

<http://www.fawc.org.uk/reports/pb8347.pdf>
<http://www.fawc.org.uk/pdf/report-090528.pdf>

A number of the observations and recommendations made in these reports and the Government response to these are reproduced and discussed below with our subsequent reaction to the Government's response (underlined).

Red Meat Animals

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

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

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

This was partially accepted. There will be a need to ensure that there is no duplication of effort between the Local Authority enforcement officers and the plant OVS. Transport checks at slaughterhouses are currently carried out by some Local Authorities. A pilot Framework Agreement on delivery of services is being developed in England and Wales to improve consistency of service delivery and standards. It is expected that the pilot scheme can be extended to all Local Authorities.

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

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

FAWC wishes the FSA to place proper focus on animal welfare in addition to its core role as guardians of food safety.

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

Response: Do not accept. The FSA considers that the full time presence of MHS officials at licensed slaughterhouses already provides a more frequent opportunity than is being recommended to review the structural approval and ensure that animal welfare assessments are met. The obligations on MHS staff to monitor welfare standards are clearly set out in their Operations Manual. Where requirements under Parts I and II of Schedule 2 of WASK are not being met, the FSA has powers to revoke the premises' licence. Audit visits by the Veterinary Meat Hygiene Advisers (VMHA) also take structural issues into account. However, the new EU Food Hygiene Regulations require all slaughter premises to be re-approved post-2006 and this will reaffirm that all animal welfare requirements are being met.

FAWC believes that the essential presence of the Official Veterinarian in the slaughterhouse does not have the same effect or provide the uniform approach that would a proper five-yearly audit.

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

Response: Partially accept. In the experience of the MHS, scoring systems are subjective, controversial and difficult to apply. It is difficult to assess whether the condition of the floor, the design of the slaughterhouse or the handling of the animal made the major contribution to the slip or fall. Action should be taken based on objective evidence without the need to apply a score. However, an assessment by MHS and competent slaughterhouse staff of where/when animals slip and fall should be made so that action can be taken to remedy the problem. The new EU Food Hygiene Regulations put the responsibility for compliance with legislation on the operator. It would sensible for operators to maintain a record of slips and

falls so that action can be taken as necessary. The Government will consider including a recommendation for monitoring slips and falls in the industry guide to best practice.

FAWC rejects the suggestion that a scoring system for slips and falls is so subjective as to be irrelevant. Many assessment systems are subjective but that does not nullify their value. Temple Grandin's methods have been used in Defra-sponsored LINK projects that have evaluated slips and falls in handling systems. We see scoring methods as valuable in-house management tools.

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

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

Recommendation 148: The OVS should monitor the keeping of records of slaughter equipment maintenance.

Response: Accept. Instructions will be issued to OVSs.

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

Response: Accept. Instructions will be issued to OVSs.

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

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

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

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

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

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

Licensing, training and staffing

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

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

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

FAWC believes that the skill of the operator is a critical factor in the welfare of animals at slaughter. The licensing section of the legislation is outdated and needs review. In most assessment situations it is best practice that the person doing the assessment is not in daily contact with those being assessed. FAWC re-iterated the need for a review of the slaughterman licensing system in its 2009 Report on white meat slaughter.

Recommendation 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.

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

FAWC would assert most strenuously that the skill and performance of the slaughterman is absolutely crucial to the welfare of the animal and a licence issued for life, without formal re-assessment of competency, is patently wrong.

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

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

It cannot be emphasised enough that killing animals, particularly in less well controlled conditions, is difficult and is often unsupervised away from the slaughterhouse. The potential risk to good welfare is very high and those carrying out this work must be trained and their competence assessed.

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

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

Legislation and enforcement

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

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

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

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

FAWC welcomed this Government response and followed up this recommendation in its white meat slaughter report.

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

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

FAWC maintains that the Official Veterinarian is expected to enforce WASK and so must be adequately trained to do so. We understand the restrictions of time but see animal welfare training as a vital part of CPD.

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

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

The Government response to the 2003 Red Meat Slaughter Report (<http://www.defra.gov.uk/foodfarm/farmanimal/welfare/govresponse/index.htm>) also made commitments to ensure MHS surveillance and enforcement activity related to other recommendations made in the FAWC report.

White Meat Animals

FAWC's Report on the Welfare of Farmed Animals at Slaughter or Killing: Part Two - White Meat Animals (2009) made further observations and recommendations for surveillance and enforcement activity in slaughterhouses and re-iterated some of the recommendations from the 2003 Report. The Government has not replied formally to each of the recommendations as it did for the red meat slaughter report.

A number of these observations and recommendations are reproduced from the original report:

36. FAWC is concerned about the MHS decision to cease publication of some slaughterhouse data; for example, the biennial animal welfare report that identified levels of compliance with legislation and trends within the industry has been discontinued. Council would welcome a resumption of the collection and publication of these welfare data.

49. Feedback from the slaughterhouse can be an incentive to improve welfare during catching and transport. Information about the number of damaged or injured birds should be fed back to the farmer, catchers and transporters by the slaughterhouse operator. The results of veterinary assessment during processing could also be included in any feedback.

93. Legislation requires that if slaughter or killing is delayed, and if it is necessary, then drinking water should be available and feed should be provided twice daily, i.e. every 12 hours. However, birds cannot practically be fed or watered in transport crates. The Official Veterinarian, in conjunction with the slaughterhouse operator and any other veterinary advisor, should decide whether to hold birds in the lairage or, in exceptional circumstances, return them to farm, e.g. if the duration of the delay in the prevailing lairage conditions would compromise the welfare of the birds. These decisions should be based on a risk assessment that delivers the best outcome for the birds' welfare.

95. *The Guidance (and any future Code of Practice) on the Welfare of Poultry at Slaughter or Killing should indicate the prevalence of injured and/or dead-on-arrival birds that is unacceptable, and that which would warrant investigative action by the Official Veterinarian. Referrals to other enforcement authorities should always be made quickly*

when required and consistency of approach across enforcement agencies should be reinforced.

191. Those operating and monitoring controlled atmosphere systems, including the responsible slaughterman and the Official Veterinarian, must be trained and able to demonstrate competence.

Licensing and training

262. Our previous analysis and conclusions about a licensing system for slaughtermen working with red meat species also hold true for poultry. The skill and performance of the slaughterman is crucial to the welfare of the animal during slaughter. We should like a review to be undertaken of the system of licensing slaughtermen, including those involved in emergency killing.

263. Slaughtermen must be trained and competent, as evidenced by a slaughterman's licence, which is awarded by the MHS. In the majority of cases, the certificate of competence (that enables a licence to be issued) is issued by the Official Veterinarian, who may also be seen to have a basic training function by the slaughterman and slaughterhouse management. We remain convinced that the training, accreditation and enforcement roles of the Official Veterinarian do not sit together comfortably. EC Transport Regulation No. 1/2005 requires that examiners of drivers for their certificate of competence must be independent. This supports our previous recommendation that a licence to slaughter should only be awarded to those who have achieved a level of competence that has been assessed and verified independently.

264. In our Red Meat Slaughter report, we were critical of the fact that a slaughterman's licence was valid for life, unless revoked or suspended. Although there is continuous assessment of performance by the Official Veterinarian, we remain concerned about those licensees who return to work but may not have worked as a slaughterman for some time. These individuals are able to restart work without any refresher training or [formal] re-assessment.

265. Animal welfare at slaughter must form an integral part of the training of any person working in a slaughterhouse. Training should encompass the wide variety of slaughterhouses, species and equipment and take account of the learning needs and abilities of trainees.

266. The Official Veterinarian enforces animal welfare legislation in the slaughterhouse and must be trained in its requirements as they relate to the many and changing systems in use for stunning and slaughter of animals and the particular welfare issues that may arise. Recently, there have been various technical improvements in systems of electrical stunning and in controlled atmosphere systems. Official Veterinarians and slaughtermen must be trained in these developments

269. Government, in partnership with industry, should review the current system of licensing slaughtermen.

271. *More attention should be paid to training in animal welfare in the Official Veterinarian's Continuing Professional Development.*

Legislation and enforcement

274. Relevant legislation and potential changes in the future were discussed earlier in this Report. References in our Red Meat Slaughter report to the potential impact on animal welfare of legislation in other areas, e.g. food hygiene or the environment, apply equally to poultry slaughter and we welcome Government's recognition of the need to take these impacts into account when developing new regulations.

275. The Red Meat Slaughter report reviewed the enforcement sanctions available to the MHS. Following its publication, we were pleased that Government intends to include improvement notices as an intermediate option between a written warning and a prosecution. Prevention of the use of certain equipment or the ability to close a slaughter line until improvements have been made, are likely to be highly effective in promoting preventative maintenance. Government also accepted a recommendation for the use of specifically trained auxiliaries, under veterinary supervision, to take on some welfare monitoring. We look forward to developments in both these areas.

276. There should be a review of enforcement in slaughterhouses that are registered with the FSA, but which do not require approval. Animals processed through small non-approved slaughterhouses should benefit from the same principles of humane slaughter as those in approved slaughterhouses and there should be assurance through adequate surveillance that they do.

Recommendation

277. *Animals processed through small non-approved slaughterhouses should benefit from the same principles of humane slaughter as those in approved slaughterhouses and there should be assurance through adequate surveillance that they do.*

285. The FSA approves the design and fitting out of slaughterhouses to ensure compliance with meat hygiene regulations. In principle, approval could be extended to include animal welfare. In addition, existing slaughterhouses should be inspected regularly, at least every five years, to ensure that their design and systems used are fit-for-purpose, especially where modifications have been made.

Recommendations

288. *Government should ensure that the approval of a slaughterhouse's design and construction includes animal welfare objectives. Existing premises should have a regular and detailed animal welfare audit, at least every five years.*

Council Regulation (EC) No. 1099/2009 on the protection of animals at the time of killing

FAWC is aware that Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing was agreed by the Council of Ministers in September and published in November. There will be additional surveillance and enforcement requirements as a result of this legislation coming into force in 2013. We look forward to GB Governments bringing forward details of their intentions in implementing the Regulation in due course.

Yours sincerely



Professor Christopher Wathes
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