

# Red Tractor Meat and Poultry Processing Scheme Consultation

## Who we are

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 19,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

## ANIMAL WELFARE MODULE

### ANIMAL WELFARE POLICY, ANIMAL WELFARE OFFICERS & TRAINING

2. As part of this consultation Red Tractor has some standard proposals relating to the collection of Welfare Outcome (WO) data at abattoirs. You can find the rationale for these proposals here: <https://tinyurl.com/35vsp9cfA> proposed standard is that abattoir members should record WO data. We have deliberately not specified what WO data should be recorded (see Q.2), just simply that it should be recorded at this stage.

#### Agree

3. Please explain

**Many facilities collect this information in any case. We agree that this is an important first step towards fully using WO data to improve animal welfare.**

4. *We are proposing that WO are recorded in line with a proposed Red Tractor Protocol. We would like to receive comments on what a Red Tractor WO Protocol should include for cattle, sheep & pigs, keeping in mind that the aim is to record WO data related to farms and transport. We do not want to reinvent the wheel and the aim of this proposal is to try and aid our processing members in streamlining the collection of WOs which many are already collecting. We are not proposing at this stage that WO are shared with Red Tractor, but longer term that will be the aim.*

#### Agree

5. *Your comments*

**This is not an exhaustive list, but some factors to consider in such a protocol would include physical indicators such as lameness, bone fractures, and mastitis; and behavioural indicators such as motivation, aggression, and feather pecking. There are also resource and human-based indicators that should be considered, along with the fact that behaviour may be reflective of treatment on the farm, and not necessarily a reflection of current stress. We would also recommend drawing on existing welfare indicators such as the [AWIN welfare indicators](#).**

**The OV has a role in returning information (AH&W) to the primary producer (as**

well as referring non-compliances for action to APHA/LAs). There are also some additional voluntary standards e.g. for pigs (AHDB pig health scheme) and the regulatory e.g. the broiler directive. The guidance should also be looking forward to the forthcoming Animal Health and Welfare Pathways.

## FACILITIES CONSTRUCTION

6. *Facilities should be fit for purpose, well-designed, constructed, maintained and operated to protect the welfare of animals. Sufficient drainage systems in the lairage/holding pens are important to remove liquid debris and the use of misting systems for pigs should be available to calm them if necessary (ensuring it allows them to rest and are not used if pigs are shivering/it's too cold).*

### Agree

7. *Please explain*

**These are basic practical requirements to ensure animal welfare, biosecurity and food safety.**

8. *Sustained animal vocalisation can be a sign of stress. An abattoir site should undertake a risk assessment to identify source of noise and ensure mitigating actions have been taken (if required) so that no sustained animal vocalisation is heard in the lairage.*

### Agree

9. *Please explain*

**Vocalisation is a complex issue, and can be a reflection of normal behaviour. A risk assessment to identify any potential causal stress factors, which can then be mitigated, is sensible. Mitigating action should not be taken indiscriminately and without proper assessment.**

## WAITING PEN & RESTRAINING FACILITY CONSTRUCTION (PIGS)

10. *Where group stunning pens are used, they should be adjustable to provide working space to allow safe and effective stunning and minimal excitement to livestock.*

### Agree

11. *Please explain*

The BVA [position on the welfare of animals at slaughter](#) recommends that:

**“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.”**

**Specifically for pigs, the BVA position states: “Gas stunning systems for pigs can offer several welfare benefits in terms of pre-slaughter handling,**

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including ensuring animals remain in social groups; the delivery of the stun is consistently effective at high throughputs; and the risk of human error which can occur in the head-only electrical simple stunning of pigs, and incorrect placement of electrodes is reduced. We support FAWC's general principles for gas stunning and killing operations in pigs under current UK legislation, which stipulates that pigs must be exposed to gas methods for long enough to ensure death."

## FIELD LAIRAGE

12. *It is important for the welfare of livestock, as well as food hygiene, that the cleanliness of an animal does not deteriorate whilst in a field lairage.*

**Agree**

13. *Please explain*

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

**That said, 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.**

**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.**

**The abattoir must ensure that acceptable standards of cleanliness are used when sorting livestock so as not to compromise meat safety. The OV has responsibility for verifying this and reporting any concerns. 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. We consider this is a shared responsibility between the producer, haulier, livestock market and abattoir. Where livestock is held in field lairage, effectively a separate agricultural holding, this is clearly the responsibility of the abattoir.**

## LIVESTOCK INTAKE

14. *It is important that if there is a delay in unloading of livestock, the risk assessment unloading sequence includes journey times ensuring longest journey is unloaded first.*

**Agree**

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15. *Please explain*

**This is essential. Transport is a stressful, uncomfortable and unnatural environment for livestock. It is key to welfare that time spent on the lorry is kept to a minimum. Animals should be slaughtered as close as possible to where they are reared.**

**However, it's important to recognise that distance and journey length are not the only influencers on the health and welfare of animals during transport. Multiple factors at different stages of an animal's journey should be considered, including:**

- **transport time and distance from point of production**
- **transport design, condition, and stocking density**
- **availability of facilities on board such as water and air conditioning**
- **driver skill, competence, and planning**
- **the ambient temperature (environmental and in-lorry).**
- **watering, feeding intervals, and rest periods**
- **monitoring of health and welfare**
- **end destination standards**

16. *Where livestock are held on a vehicle and are being monitored, it is key that Animal Welfare Officer and the Official Veterinarian work together to safeguard animal welfare and that for pigs, welfare checks are undertaken every 30 minutes.*

**Agree**

17. *Please explain*

**Animals should be monitored by trained professionals while on the lorry. These checks must be done by a vet or AWO. We agree that checking every 30 mins is the minimum sufficient to ensure the welfare of pigs, and should be done more frequently where conditions require (e.g. very hot weather), or where they are in mixed/unfamiliar groups, as this can trigger aggressive behaviour.**

18. *For livestock lairaged overnight, checks should be made by a suitably trained and competent person every morning & evening which allows for a non-Certificate of Competence holder to deal with an emergency out-of-hours (noting that the carcass cannot enter the food chain).*

**Agree**

19. *Please explain*

**Twice daily checks by a competent person are the minimum necessary to assure welfare. We accept that such a person may not always be on hand for overnight emergencies. Any person on duty out of hours, must be supported to identify and report welfare concerns through e.g. training and SOPs. They must contact a competent person or vet immediately, should there be any concern about welfare or in an emergency. Treatment or euthanasia should only be carried out by a trained slaughterer or vet. Where required, euthanasia should not be delayed. In the event of the death of an animal out of hours, removal of the carcass from the food chain is an acceptable mitigation.**

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## Livestock lairage (pigs)

20. *Environmental enrichment should be permanently available to all pigs in lairage pens in the day to help minimise abnormal behaviour (e.g. aggression) and to increase the pigs' ability to deal with a stress.*

**Agree**

21. *Please explain*

**We support the introduction of appropriate enrichment materials as a way to keep animals calmer, and to reduce incidences of aggression, tail biting and other stress-related behaviours, which compound the existing stress of the unfamiliar environment, and may have an effect on meat quality. Enrichment materials must be easily cleaned or disposed of to avoid the spread of disease in lairage pens.**

## Livestock handling (pigs)

22. *Electric goads should be prohibited on all pigs (current standard allows electric goads only on adult pigs where a V restrainer stunning system is used).*

**Partially agree**

23. *Please explain*

**We support the Humane Slaughter Association (HSA) guidance on the Humane Handling of Livestock that outlines key principles to ensure the humane, effective, and safe handling of livestock at slaughter. The guidance sets out that:**

***“The objective of humane animal handling is to move animals with minimum stress to both the animals and handler. Considerate handling reduces the risk to the animal of pain, injury, [distress] and suffering. [...] In a well-designed and well-run handling system, animals will not become trapped or jammed and there should be no routine need for electric goads or other forceful handling aids. All systems should be designed to prevent injury and to keep animals calm whilst passing through them.”***

**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.**

## STUNNING & KILLING

24. *The reason for re-stuns/double stuns should be documented in records so that food businesses can identify any trends and address the root cause/s with the aim of reducing miss stuns and improving animal welfare at point of stunning*

**Agree**

25. *Please explain*

**It is important to distinguish between ineffective stunning (where the stun**

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application does not render an animal immediately unconscious and the animal is demonstrating indicators of consciousness) and repeat stunning (where a second stun is immediately applied to the animal after the first stun as a precautionary measure to ensure that the stun has been effective). Repeat stunning is not associated with indicators of recovery or consciousness in the animal. We therefore consider that, if applied immediately after the first stun application, repeat stunning is a technical non-compliance, and not an animal welfare non-compliance. To encourage and support staff in their application of effective stunning, Food Business Operators (FBOs) should develop repeat stun Standard Operating Procedures (SOPs) and clearly communicate the importance of repeat stunning to staff to minimise animal suffering and safeguard animal welfare.

## WELFARE INCIDENTS

26. *In terms of any site emergencies/serious incidents, Red Tractor should be notified immediately to minimise reputational impact for all concerned and work with the business to manage any fall-out, if an incident is or could attract media interest.*

### **Partially agree**

27. *Please explain*

**It is necessary to manage reputational impact, and it is important that Red Tractor is informed promptly. However, this must not come before welfare and safety concerns. The priority in such situations must be to contact the OV and/or AWO to support site staff in managing the incident and reducing the impact on livestock**

28. *Very occasionally standards can slip and we need to know about it so we can ensure things are put right. Poor performance of suppliers (farms & hauliers) should be reported to Red Tractor where there is a recurring issue (which includes reporting of FSA Annex 4 reports related to farm/transport issues).*

### **Agree**

29. *Please explain*

**It is important that such situations are reported, including to the OV and AWO.**

## VEHICLE WASHOUT FACILITIES

30. *Cleaning & disinfecting of vehicles after animals have been unloaded is an important step in minimising animal disease spread. For vehicles which transport cattle and sheep and wash-out at the site, a spot check should take place to verify cleanliness after wash-out and before leaving the site. For pigs, a sample of vehicles should be spot checked for visual cleanliness by using a wipe test before they leave the site.*

### **Agree**

31. *Please explain*

**Recent concerns over bird flu and African swine fever have shown the**

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**importance of basic hygiene around the movement of animals, and contact between animals from different locations. The measures proposed are sufficient and proportionate.**

*32. It is important to minimise animal disease spread that equipment at vehicle wash-out facilities are designed to operate effectively and are capable of effective cleaning*

**Agree**

*33. Please explain*

**This is a basic minimum standard to prevent the spread of disease.**

*Do you have any other comments?*

*34. Please let us know*

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## Poultry Welfare Module

### POULTRY WELFARE POLICY, WELFARE OFFICERS & TRAINING

1. *Animal Welfare Officers (AWOs) should have an external source of training e.g. Bristol Poultry Welfare Officer course in addition to Certificate of Competence training since this is best practice for staff that hold managerial responsibility and it also provides a level of continuous professional development.*

#### **Agree**

2. *Please explain*

**This seems like a sensible provision to attain best practice standard.**

3. *Red Tractor should be notified immediately in the event of an emergency or serious incident to minimise reputational impact for all concerned and work with the business to manage any fall-out, if an incident is or could attract media interest. We can also consider derogations if there is a knock-on impact on farm standards (e.g. stocking density).*

#### **Partially Agree**

4. *Please explain*

**This is important, and we support Red Tractor being notified promptly of such an incident, however, welfare and safety must be prioritised over reputation, and the AWO and OV should be called as the priority.**

5. *As part of this consultation Red Tractor has some standard proposals relating to the collection of Welfare Outcome (WO) data at abattoirs. The rationale behind these proposals is available here: <https://tinyurl.com/35vsp9cf>. A proposed standard is that poultry abattoir members should record WO data (for chickens & turkeys, as ducks already record this as part of the RT Scheme). We have deliberately not specified what WO data should be recorded (see Q.2), just simply that it should be recorded at this stage.*

#### **Agree**

6. *Please explain*

**As for other livestock, this seems like a sensible first step to making more effective use of WO data. Since this is already in place for ducks we see no reason not to expand it to other poultry.**

7. *We are proposing that WO are recorded as per the Red Tractor Protocol, however this Protocol will need to be developed. Therefore, we would like to receive comments on what the Red Tractor WO Protocol should include for chicken and turkeys, keeping in mind that the aim is to record WO data related to farms and transport. We do not want to reinvent the wheel and the aim of this proposal is to try and aid our processing members in streamlining the collection of WOs which many are already collecting. We are not proposing at this stage that WO are shared with Red Tractor (apart from duck WO), but longer term that will be the aim.*

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**Agree**

8. *Please explain*

The Welfare Quality [assessment protocol for poultry](#) is a useful reference here.

## THE LAIRAGE

9. *Lairage facilities should be fit for purpose to protect the welfare of birds. The design of the lairage should avoid birds becoming wet from the lorry wash, the floor should avoid jarring/bouncing of crates/modules when moving birds and there should be no pooling of water after the lairage is cleaned & disinfected (from a biosecurity perspective).*

**Agree**

10. *Please explain*

**These are appropriate as minimum required standards for the welfare of poultry in lairage, and for biosecurity.**

## POULTRY INTAKE

11. *Records for each load of birds received at an abattoir should contain all required information and allow for feed & water withdrawal times to be easily calculated. Abattoirs should have a system in place to check that Animal Transport certificates (ATCs) and Food Chain Information (FCI) reports contain all required information.*

**Agree**

12. *Please explain*

**This should be done as a matter of course to ensure the welfare of the birds and the integrity of the foodchain.**

13. *Poultry abattoirs should be aiming to reduce their Dead on Arrivals (DOAs) from a bird welfare, commercial and industry reputation perspective. An investigation to establish the root cause should be undertaken if DOAs in a single load exceed 1% (chicken), 0.2% (turkeys) and 0.3% (ducks).*

**Agree**

14. *Please explain*

**Where excess DOAs are in a single load, this indicates a potential problem somewhere in the chain, and that the birds' welfare is not being sufficiently protected. An investigation is necessary to prevent further suffering. We are not sure of the grounds for permitting a much higher percentage of DOAs with chickens than with other birds, but have no objection provided there is a rational basis for this.**

## ELECTRICAL STUNNING & KILLING

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15. EFSA (2004) reported that live shackling imposes a greater load on birds' legs as bird weight increases. Therefore, large birds weighing >15kg liveweight should not be shackled whilst conscious (and stunned using an electric water-bath as the primary method of stun/kill).

**Partially agree**

16. Please explain

**Agree as a first step. However, electrical-waterbath stunning should be gradually phased out and the meat industry should move towards recoverable stunning methods that immediately and effectively stun birds of all sizes, strains, and ages, and remove the need for live shackling and inversion pre-slaughter. There is an urgent need for research into the development of recoverable stunning methods that effectively stun birds of all sizes, strains, and ages, and remove the need for live shackling and inversion pre-slaughter.**

**We would like to know the basis for 15kg being the maximum liveweight for shackling. This seems very high. A lower limit would be more effective in reducing live shackling.**

17. Carbon dioxide is known to be aversive to poultry and it's been recommended to use carbon dioxide at concentrations of 30% to induce unconsciousness. Therefore, for bi-phasic and multi-phase gas stunning system, carbon dioxide should not exceed an average maximum concentration of 30% until birds have lost consciousness (absolute max concentration of 33%).

**Agree**

18. Please explain

**This is in line with current legislation. There is a lack of scientific data to demonstrate at what point birds are rendered unconscious before exposure to the more aversive 40% carbon dioxide concentrations. We would like to see further research into this area.**

19. Please provide comments on whether all available bi-phase/multi-phase carbon dioxide gas stunning/killing systems i.e. tunnels, pits and closed cabinet designs are able to set a max carbon dioxide % as low as 30% (absolute max 33%) without impacting on the stun/kill effectiveness of chickens and turkeys.

**We are unable to comment.**

## **LOW ATMOSPHERIC PRESSURE STUNNING (LAPS)**

*This section provides standards proposals for members if they wish to use LAPS as a primary method of stunning/killing for chickens up to 4kg liveweight. The proposals are based on legislative requirements to ensure birds are stunned/killed without pain and distress.*

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20. *If you have any comments on this section please let us know.*

**There are knowledge gaps with regards to the effect of expansion of gases in body cavities, extent of expansion and potential for aversion. Further research should therefore be undertaken into the effects of LAPS on different sized birds, different species, potential for aversion, and the effect of gas expansion in body cavities before it is widely used as a stunning method for poultry or game in the UK.**

## **TRANSPORT WASH FACILITIES**

21. *Ensuring thorough cleaning and disinfecting of poultry transport crates/modules and vehicles is important to minimise animal disease spread e.g. Avian Influenza. Therefore, automated machines should be inspected daily to ensure their effectiveness and soak systems and water agitation systems should operate to standard*

**Agree**

22. *Please explain*

**This is a common sense approach to hygiene and reducing the spread of disease.**

23. *If you have any further comments with regard to the current Red Tractor Meat & Poultry Processing Standards, or the standard proposals outlined in this consultation, please provide them here.*

**One of the biggest gains for welfare and meat hygiene, with the least input, would be through slowing the line speed. This would allow workers to ensure stuns had been properly administered and would reduce damage to carcasses and the potential for contamination.**

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