

BVA position on the welfare of animals at slaughter

Executive summary

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.¹

We support the Farm Animal Welfare Committee's² principles of humane slaughter as set out in the FAWC opinion reports on the welfare of farmed animals at slaughter or killing^{3,4}:

“Slaughter [...] is the final event in a farm animal's life. The following principles must be observed if slaughter [...] is to be humane with minimal pain, suffering and distress:

- All personnel involved with slaughter [...] must be trained, competent and caring
- Only those animals that are fit should be caught [or penned], loaded and transported to the slaughter site
- Any handling of animals prior to slaughter must be done with consideration for the animals' welfare
- In the slaughter facility, only equipment that is fit for the purpose must be used
- Prior to slaughter of an animal, either it must be rendered unconscious and insensible to pain instantaneously or unconsciousness must be induced without pain or distress
- Animals must not recover consciousness [before] death ensues.”

To build on these principles and improve welfare at slaughter, we have set out **67** recommendations across each stage of the slaughter process.

Summary of recommendations

The vital role of the Official Veterinarian (OV)

Recommendation 1: The UK Governments, competent authorities and service delivery partners should emphasise the value that Food Business Operators of any size can gain from the expertise of OVs. BVA and VPHA also have a role to play in communicating the value of OVs to the UK governments, service delivery partners, Food Business Operators, retailers, farmers, farm quality assurance schemes, consumers, and others involved in the food industry.

Provision of suitable abattoir facilities

Recommendation 2: 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 near to the point of production/origin as possible, or at the nearest appropriate slaughter facility.

¹ For the purposes of this position, we have deemed on-farm emergency slaughter as out of scope. Current legislative requirements for on-farm emergency slaughter are set out in Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32017R0625>

² 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.

³ FAWC, 2014. Opinion on the welfare of farmed fish at the time of killing. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/319331/Opinion_on_the_welfare_of_farmed_fish_at_the_time_of_killing.pdf

⁴ FAWC, 2003. Report on the welfare of farmed animals slaughter or killing. Available at: <https://www.gov.uk/government/publications/fawc-report-on-the-welfare-of-farmed-animals-at-slaughter-or-killing>

Recommendation 3: To support low-throughput abattoirs to meet and build on legislative requirements for animal health and welfare, the UK Governments, food processing industry and the veterinary profession should work together to develop a voluntary industry standard eg through a government-led working party.

Recommendation 4: Annual figures on the total number of animal welfare non-compliances, with clear and specific examples, across small, medium and large abattoirs, as well as per million animals, should be routinely published.

Recommendation 5: Positions on different models of abattoir provision and the resulting impact on animal health and welfare should be informed by a welfare outcomes approach.

Preparation, transport and acceptance for slaughter

Recommendation 6: Competent authorities, Chief Veterinary Officers (CVOs), farmers' unions, Livestock Auctioneers Association (LAA), Road Haulage Association, Food Business Operators and retailers should be united in their message that animals will not be accepted for slaughter unless they are clean and continue to reiterate that presenting clean livestock at the abattoir benefits all stakeholders in the production chain.

Recommendation 7: Competent authorities should consolidate existing guidance documents to support the preparation and acceptance of animals for slaughter, provide a uniform, photographic grading scale of cleanliness, and encourage Food Business Operators to implement 'Clean Livestock Policies'. Such policies should include further action if animals do not meet the minimum levels of cleanliness required by food hygiene regulations.

Recommendation 8: Appropriate bedding should be provided during transport to maintain the cleanliness of livestock on arrival to the abattoir, and the benefits of doing so communicated to producers and hauliers by the competent authorities, veterinary associations, Chief Veterinary Officers, Road Haulage Association, farmers' unions, Food Business Operators and retailers.

Recommendation 9: Data from the Food Chain Information declaration and Collection and Communication of Inspection Results should be fed back to the farm veterinary practice and transporter, as well as the producer, to inform future herd and flock health planning at the 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

Recommendation 11: Competent authorities should require all Certificate of Competence holders to revalidate their qualification at set intervals.

Recommendation 12: Competent authorities should carry out an impact assessment in consultation with the FDQ to determine the appropriate revalidation period for Certificate of Competence holders eg three or five years.

Recommendation 13: Consideration should be given to including a declaration within the Certificate of Competence that holders would have to sign to confirm that they are familiar with the relevant best practice documents for the species with which they work.

Recommendation 14: Guidance that distils the key message and supports these with visual representations, photographs or videos of what best practice in handling and facility design looks like, eg as used in the [European Commission fact sheets on handling and restraining livestock](#), should be available for all species slaughtered in the UK.

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 OVs.

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

BVA policy position on the welfare of animals at slaughter – Executive summary

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 should inform the development of statutory minimum lairage space allowances across species.

Recommendation 19: A suitable restraint system should be developed for goats. It may be useful to conduct research into handling systems that are being employed on-farm for goats to assess whether they could be adopted in the abattoir setting.

Recommendation 20: Emerging handling systems that are developed to restrain both sheep and goats, should be designed to allow the effective and humane handling of goats as well as sheep.

Recommendation 21: The UK Governments should provide specific legislative protections for the welfare of farmed finfish at slaughter.

Recommendation 22: There should be further research into the use of pre-slaughter anaesthesia for fish in the UK to improve welfare at the time of harvesting.

Effective stunning, data capture and reporting

Recommendation 23: All animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering.

Recommendation 24: Legislation should specify evidence-based maximum stun-to-stick intervals for species routinely slaughtered with simple stunning methods.

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.

Recommendation 26: If there is any doubt as to whether the stun has been applied effectively, operators should apply a repeat stun immediately.

Recommendation 27: Operators responsible for monitoring indicators of consciousness should assess brain function against several indicators of consciousness.

Recommendation 28: Further species-specific data on indicators of consciousness should be collected and the sensitivity and specificity of these indicators should be assessed for all species routinely slaughtered in the UK .

Recommendation 29: Food Business Operators 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.

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.

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.

Recommendation 32: The development of effective, humane and economically viable stunning methods should be incentivised by government and industry funding to improve welfare at slaughter.

Recommendation 33: Captive-bolt velocimeters should be developed and used to measure and improve the effectiveness of captive-bolt stunning. These can either be stand-alone or active, ie fitted to the stunner.

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 less aversive gas stunning methods with the aim of phasing out current aversive gas stunning methods for pigs.

Recommendation 38: The stunning of pigs using inert gases such as argon (or nitrogen), or gas mixtures containing up to 30% carbon dioxide in argon (or nitrogen) should be explored.

Recommendation 39: Consideration should be given to amending legislation to permit simple stunning by gas methods to encourage the use of less aversive gas methods and improve pig welfare at slaughter.

Recommendation 40: Until electrical-waterbath stunning is replaced with more effective methods, all of the UK regulations on the Welfare of Animals at the Time of Killing must specify that electrical-waterbath stunning must be carried out in accordance with the minimum currents laid down in Annex I of EC 1099/2009.

Recommendation 41: 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.

Recommendation 42: 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.

Recommendation 43: Islamic scholars and Halal certification bodies should also be consulted to ascertain whether simple stunning by gas methods would be accepted in Halal production (ie. deliver a recoverable stun). If recoverable stunning via gas methods were considered suitable for Halal production, consideration should also be given to amending legislation to permit simple stunning by gas methods.

Recommendation 44: There should be further research into the following areas to inform the development of new electrical stunning methods for poultry:

- Electrical pathways through birds in relation to system design and the requirements of an effective stun;
- High frequency AC and pulsed DC should be assessed to determine the optimum combination of current and frequency to stun birds of all sizes, strains and ages effectively; and
- Electrical stunning systems which address the concerns of variable current and reduce the need for inversion and live shackling.

Recommendation 45: There should be further research to determine at what point birds are rendered unconscious before exposure to aversive concentrations of carbon dioxide in the LINCO gas stunning system.

Recommendation 46: There should be further research 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.

Recommendation 47: There should be further research into the overall welfare implications of the use of captive-bolt as a stunning method in horses, including the most effective style of equipment, charge and size of cartridge.

Recommendation 48: Veterinary surgeons should be able to explain the implications of permanently signing horses out of the food chain, and discuss all end-of-life options for horses with their clients, including the effectiveness of humane slaughter methods that are available for horses in UK abattoirs and carcase disposal.

Recommendation 49: The UK governments should include the stunning of farmed fish (including detailed requirements of key parameters), alongside general welfare protections at slaughter in UK Welfare of Animals at the Time of Killing regulations.

Recommendation 50: There should be further research to develop effective, humane and commercially viable methods of stunning for wild-caught fish.

Recommendation 51: Once effective, humane and commercially viable methods of stunning wild-caught fish are developed, the UK governments should include the stunning of wild-caught fish in commercial fisheries alongside general welfare protections at slaughter in UK Welfare of Animals at the Time of Killing regulations.

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

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.

Recommendation 55: Schedule 1 of the UK's Welfare of Animals at the Time of Killing regulations should be amended to include rabbits in the prohibition of routine stunning of an animal with a non-mechanical percussive blow to the head.

Recommendation 56: There should be additional research to establish minimum effective parameters and indicators of consciousness for captive-bolt use in rabbits.

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

Recommendation 57: While our long-term aim is to move towards an end to non-stun, the UK governments should introduce a non-stun permit system to ensure that the number of animals slaughtered without prior stunning does not exceed the relevant demand of the UK's religious communities.

Recommendation 58: The export of meat from animals that have not been stunned before slaughter should be prohibited by law.

Recommendation 59: Recoverable stunning methods should be developed in consultation with Islamic scholars and Halal certification bodies to ensure that they meet Halal criteria and potentially increase the numbers of animals that are stunned before slaughter.

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.

Recommendation 61: The veterinary profession should work collaboratively with the meat industry, farmers unions, UK governments, Islamic scholars and Halal certification bodies to develop and implement a quality assurance framework for Muslim consumers that certifies specific recoverable stunning methods.

Consumer education and food labelling

Recommendation 62: The veterinary profession should continue to promote the benefits of properly valuing meat and meat products, where quality encompasses good animal health and welfare, including welfare at slaughter and pre-slaughter stunning.

Recommendation 63: The veterinary profession should continue to encourage 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.

Recommendation 64: Meat and meat products from animals that have not been stunned before slaughter should be clearly labelled so that consumers can make informed purchasing choices, with the information readily available to those who want it. Any proposed system of slaughter labelling would need wider consultation with industry, key stakeholders, and consumers before it is implemented.

Recommendation 65: Public services should only procure meat and meat products from animals that have been stunned before slaughter, unless there is a specific request to meet the needs of a specified UK religious community (as per the derogation).

Recommendation 66: The Government Buying Standards (GBS) for food and catering services should be amended to include a specific standard that specifies that all meat and meat products must be from animals that have been stunned before slaughter, unless there is a specific request to meet the needs of the UK's religious communities (as per the derogation).

Recommendation 67: Where public services procure meat and meat products from animals that have not been stunned before slaughter to meet the needs of the UK's religious communities, it should be clearly labelled as such on the menu and in any accompanying literature.