8 March 2019

BVA AND VPHA JOINT RESPONSE TO APGAW ABATTOIR PROVISION INQUIRY

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 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.

2) The Veterinary Public Health Association (VPHA) is a division of BVA and is committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.

3) We welcome the opportunity to respond to this inquiry and consideration of improvements to the welfare of animals at slaughter. We are supportive of the UK Government’s ongoing commitment to maintain and where possible enhance animal welfare standards, including health and welfare standards within slaughterhouses. Any improvements to the provision of abattoirs, or the health and welfare standards achieved within them, should be evidence-based and informed by a welfare outcomes approach.

4) As part of this, we recognise the value of both large and small abattoirs and support the provision of slaughter facilities across the UK. We would support the consideration of providing more opportunities for farm animal slaughter as close to the point of production was possible, in turn reducing the need for animals to be transported over longer distances.

5) However, any considerations must ensure compliance with current legislative requirements for animal health and welfare at slaughter, CCTV, biosecurity, food safety and hygiene checks, including ante- and post-mortem inspections performed by Official Veterinarians. Consequently, any considerations of providing more opportunities for farm animal slaughter, whatever the size of the establishment, should not represent a downgrading of animal health and welfare or public health standards.

Provision and demand

6) 1. Has the decline in abattoir provision caused concern for your industry/sector and for what reasons?

Sufficient provision of abattoirs to meet demand

In consultation with our members, we consider that there remains sufficient provision of abattoirs to meet demand. Anecdotal evidence received by our membership
suggests that abattoirs have closed due to a lack of throughput, lack of succession within the business or incentives to sell land on which the abattoir is based.

7) **Rationalisation of the slaughter industry and improvements to standards**

In addition, it is important to recognise that the reduction in small abattoirs also reflects the inevitable rationalisation of the slaughter industry. Further, as standards, including those for welfare, improve, this has required slaughter premises to replace or update their equipment to be able to uphold these standards, seeing some premises unable to do this and therefore close. In this context, it is important to emphasise that BVA would oppose any system that would introduce two standards of production, processing or certification eg. a two-tier system of standards for larger and smaller abattoirs. This would increase the risk of food fraud, potentially compromise animal welfare and leave the UK unable to provide public health guarantees to consumers.

8) **Impact of reduction in provision on length of journeys**

As a general principle to safeguard animal health and welfare, 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 as possible and should not be transported long distances to the abattoir or other end destination.

9) Whilst reduced provision of abattoirs may result in an increase in the length of journeys of animals to slaughter, BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders\(^2\) and Regulations\(^3\)\(^4\)) that are in force to protect the health and welfare of livestock during transport.

10) Research has indicated that transport conditions and fitness to travel are of greater importance than journey duration in terms of safeguarding the health and welfare of animals during transport.\(^5\)\(^6\)\(^7\)\(^8\) As outlined above, current legislation to safeguard animal welfare during transport provides regulatory powers to address transport conditions and animals’ fitness to travel as concerns that may arise from a reduced provision of local abattoirs. Consideration should therefore be given as to how authorities can better utilise and effectively enforce current legislation if longer journey lengths to slaughter are required.

11) Further, it is important to highlight that longer journeys to slaughter are normally made

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2. [The Welfare of Animals (Transport) (Wales) Order 2007](#)
3. [The Welfare of Animals (Transport) (Scotland) Regulations 2006](#)
4. [The Welfare of Animals (Transport) Regulations (Northern Ireland) 2006](#)
using newer, better designed and maintained vehicles, which will reduce the risk of welfare compromise. Based on anecdotal evidence from our members, however, we are concerned that some of the vehicles arriving at smaller abattoirs are in poor repair.

12) 2. Are large scale abattoirs able to meet the needs of your industry/sector?
In consultation with our members we consider that large abattoirs tend to supply large retailers and do not wish to provide a service for small throughputs so will not generally be able to provide a service to small butchers and retailers etc. However, we understand that medium-sized abattoirs are able to fill this gap if there is a business need from small retailers.

Welfare at slaughter at different sized establishments

13) Compliance with legislative requirements
We support provision of abattoirs across the UK that are compliant with current legislative requirements for animal health and welfare at slaughter as set out under Welfare of Animals at the Time of Killing (WATOK) regulations for England. This includes CCTV, biosecurity, as well as food safety and hygiene checks, including ante- and post-mortem inspections performed by Official Veterinarians.

14) The role of the Official Veterinarian
It is important to emphasise that the role of the Official Veterinarian in abattoirs, whatever the size, is critical in terms upholding current legislation for the welfare of animals at slaughter, safeguarding animal welfare, animal and public health, as well as providing the trade certification that so many of the UK’s global customers demand.

Regulation (EC) 854/2004 sets out a requirement for all abattoirs to have an Official Veterinarian (OV). In the UK OVs are appointed to conduct work on behalf of the FSA and the Animal & Plant Health Agency (APHA). Responsibilities include:

- Ante- and post-mortem inspections of animals and carcases.
- Animal welfare – conducting clinical examinations and ensuring that animals are slaughtered humanely.
- Animal and public health – undertaking surveillance to detect signs of disease that may affect human and/or animal health.
- Auditing good hygiene practices.

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

“[The] OIE has identified animal production food safety as one of its high priority initiatives. The Veterinary Services of our Member Countries are central to this mission. They have an essential role to play in the prevention and control of food-borne zoonoses, even when animals are not clinically affected… The OIE will continue to publicise and promote the fundamental role of the Veterinary Services in the area of food safety, both on-farm and at the abattoir level.”

It cites the detection of foot and mouth disease in an abattoir in 2001 as an illustration
of the essential role of OVs:

“[The] OIE still considers abattoirs to be key points in epidemiological surveillance for zoonoses as well as other animal diseases. The fact that the first case detected during the foot and mouth disease epizootic in the United Kingdom in 2001 was in a pig abattoir clearly illustrates the relevance of this approach and the danger should it be called into question.”

15) **Welfare outcomes assessment**
As part of this, BVA recognises that from an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs when assessing how well an abattoir, whatever the size, provides for an animal's health and welfare. BVA therefore supports welfare outcome assessment as a tool to drive continuous improvement of animal management and husbandry, in turn promoting high animal health and welfare throughout the slaughter process and ensuring good food hygiene. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare.

16) **3. Do you feel the welfare of the animals you take to slaughter is compromised at a large-scale abattoir and if so how?**

It is important to avoid oversimplification when considering how different sized abattoirs address animal health and welfare needs throughout the slaughter process. As part of this, it is important to recognise that health and welfare outcomes are not solely dependent on the type or size of abattoirs.

17) **Overall large abattoirs have good standards of welfare and modern, efficient, handling systems. Due to customer demand, welfare is very much a priority.**

18) **4. Do you feel the welfare of the animals you take to slaughter is compromised at a smaller abattoirs and if so how?**

As outlined above, it is important to avoid oversimplification when considering how different sized abattoirs address animal health and welfare needs throughout the slaughter process. As part of this, it is important to recognise that health and welfare outcomes are not solely dependent on the type or size of different slaughterhouses.

19) **Whilst many small abattoirs will ensure good health and welfare outcomes, we are conscious that smaller abattoirs will often have group stunning pens with no reduction system or crowding gate in place, which can cause handling issues during the restraint and stunning of animals.**

Traceability

20) **5. Do you think increased traceability is the best way to improve animal welfare standards? Can large scale abattoirs provide this or would it be better achieved by more abattoirs of different sizes and how?**
We consider that larger abattoirs have excellent traceability as this is required by their customers. However, it is important to recognise that traceability is only a benefit to animal health and welfare if the relevant information is fed back and acted upon as part of continuous improvement of health and welfare standards in abattoirs.

21) In addition, by improving traceability it could be possible to determine if an animal had been slaughtered with or without stunning and so drive a transparent labelling system regarding stun/non-stun meat, allowing consumers to make an informed choice about the provenance of the animal derived products they are purchasing.

Economics of different sized abattoirs

22) 6. Do large scale abattoirs affect the rural economy and, if so, in what way? Would small abattoirs, geographically dispersed, affect the rural economy and, if so, how?

Large abattoirs provide regular employment for a range of rural businesses, including hauliers. Small abattoirs tend to work one or two days per week, business opportunities are therefore less.

23) 7. Do you have any examples of small abattoirs running a sustainable and viable business which you could share? How do the economics of smaller abattoirs compare to those of larger abattoirs?

Many small abattoirs are linked to butchers and similar outlets and these together provide a viable business. A small abattoir on its own can struggle with throughput of livestock and employing staff on a regular basis. Large abattoirs are also subject to financial pressures usually from customers who are cost driven. Larger abattoirs are therefore often reliant on the ‘large numbers’ model (ie. volume of throughput) to maintain viability and have become increasingly reliant on fifth quarter sales to remain profitable.

24) 8. Could the economics of smaller abattoirs be improved, including reduced costs, mutual or cooperative ownership and targeted public support?

Any efforts to improve the economics of smaller abattoirs must not represent a downgrading of animal health and welfare or public health standards or a departure from current legislative requirements eg. through removing the requirement for all abattoirs to have an Official Veterinarian as set out under Regulation (EC) 854/2004.

25) However, a co-operative approach with shared resources eg. staff working on different sites would have the potential to reduce costs. At present, many small abattoirs open for less than 5 days a week, but staff across small abattoirs have the same working days, resulting in higher staff demand for both slaughter men and FSA staff on some days rather than others. This could be avoided with improved coordination of staff resource amongst small abattoirs.
26) We would support Government recognition of the provision of abattoirs that uphold high animal health and welfare and food hygiene standards, in line with current legislation, as a public good for both producers and consumers. This should be applicable to all abattoirs that uphold relevant legislation, regardless of size.

Additional comments

27) BVA position on mobile abattoirs
We are aware that stakeholders are currently exploring the feasibility of mobile abattoirs as a means to increase local abattoir provision.

28) BVA is supportive of exploring options to provide more opportunities for farm animal slaughter as close to the point of production as possible, in turn reducing the need for animals to be transported over longer distances.

29) The role of mobile abattoirs should be further explored to create more opportunities for on-farm slaughter of animals destined for human consumption.

30) Mobile abattoirs would need to comply with current legislative requirements for animal health and welfare at slaughter, biosecurity, food safety and hygiene checks, including ante- and post-mortem inspections performed by Official Veterinarians. In addition, there would be a need for safe lairage facilities, a potable supply of water, facilities for the disposal of animal by-products, as well as suitable facilities for the dressing and movement of carcases.

31) As emphasised in the above section, any growth in mobile abattoirs should not represent a downgrading of animal health and welfare or public health standards and we could only support the use of mobile abattoirs where appropriate supervision from Official Veterinarians was in place.