BVA RESPONSE TO FAWC CONSULTATION CALLING FOR INFORMATION ABOUT THE IMPLICATIONS FOR FARM ANIMAL WELFARE OF ON-FARM KILLING

Introduction and background

1. The British Veterinary Association (BVA) welcomes the opportunity to provide comments on the FAWC consultation on sustainable livestock production.

2. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 14,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns. This response has been prepared with particular involvement from the BVA’s Veterinary Policy Group and Ethics and Welfare Group, as well as our specialist divisions the Sheep Veterinary Society and Pig Veterinary Society.

Responses to FAWC’s questions

➢ Question One

Are the various reasons for on-farm killing adequately defined in the legislation and are there any tensions between them?

3. We consider that care should be taken with the terminology used in relation to on-farm killing. The term emergency on-farm slaughter is often now used for animals that can be eligible for human consumption, seemingly in place of the phrase Casualty Slaughter for human consumption.

4. In the list of reasons for on-farm killing identified by FAWC, it is not clear what is meant by management/husbandry killing and how this is differentiated from any of the other parameters in the on-farm situation. Could this relate to the removal of animals of low economic worth, such as Friesian Bull calves or weak lambs?

5. BVA supported the recent FSA proposal to reinforce the emergency slaughter certification instructions within the FSA’s Manual for Official Controls (MOC) so that animals slaughtered on farm, that have suffered an acute accident preventing the transport of an otherwise healthy animal to a slaughterhouse, are not accepted by slaughterhouses without the correctly completed certification.

➢ Question Two

Are there welfare implications of the requirements and restrictions under EU Regulations 853/2004 (meat hygiene) and 1099/2009 (protection of animals at the time of killing) and any other legislation?
6. We consider that in general there is currently sufficient legislation to protect animal welfare and discourage illegal killing.

7. One legislative anomaly (in England, Wales and Scotland) under food hygiene law is that only the owner can slaughter their animal on the farm for home consumption by their immediate family, and a licensed slaughterman is not permitted to slaughter dress or butcher the animal. In some cases, it may be preferable to allow someone who is better qualified such as a slaughterman or a competent person under 1099/2009, to be used. It is understood that the FSA recently consulted on this matter and is looking into revising its policy on home slaughter.

8. We do not believe that the requirement for a private vet to have to be present at the time of emergency slaughter and sign it off is necessary. If the animal is slaughtered and bled by a licensed slaughterman (ie under WASK but with a certificate of competence under WATOK), then that same person should also be considered by the FSA to be responsible enough to sign off the date and time. Having a vet present at the time of slaughter can pose many practices with difficult logistical issues.

9. We believe that the private veterinarian's role should be to certify that in their opinion, the animal has suffered an injury consistent with an accident, and having satisfied the requirements of ante-mortem inspection, the carcase would be fit to be presented to a slaughterhouse for meat inspection. The declaration would need to be amended to allow for a date/time by which the animal must be humanely slaughtered, in a similar way that the previous OTM certificates were worded.

10. It is unlikely to be practical for the veterinarian to wait for the arrival of the slaughterman. In all situations the welfare of the animal is paramount and the animal should not suffer due to any time delay in carrying out the process.

» Question Three

What are the unresolved welfare problems related to:

- Species?
- Neonatal to grown animals?
- Numbers of animals?
- Methods and equipment?
- The decision making process?
- Standard Operating Procedures (SOPS (written instructions aimed at achieving uniformity of performance of a specific function or standard))?
- Competence of those engaged in killing of animals on-farm?
- Monitoring, supervision and enforcement?
- Information gaps?
- Other aspects?

11. We are not aware of major welfare problems associated with on-farm killing. However, where there are inadequacies in the decision making process and competency of those concerned, this can impact on the welfare of animals.

12. One of the largest unresolved welfare problems is the narrow criteria concerning emergency slaughter on-farm for human consumption, which results in animals that
are unfit to travel but do not satisfy the criteria being kept in the hope of improvement and salvage of the resource.

13. We feel that there is an issue with animals with localised chronic conditions (mainly lameness, particularly in sheep) which are unfit to travel to the slaughterhouse but would otherwise pass ante-mortem inspection and be eligible to be presented for human consumption. These animals do not satisfy the criteria for On Farm Emergency Slaughter, but often have a poor long-term prognosis. If there were a way to access these animals, earlier removal would ultimately improve their welfare, and minimise the wastage of potentially fit animals. It would also help reduce conflicts between farmers, vets and abattoirs.

14. In all situations where animals are required to be killed on-farm, the welfare of the animal is of paramount importance and as such the methods used and the competency of the operator should be such so that unnecessary suffering does not occur. Guidance on methods are available from Humane Slaughter Association (leaflets and videos), though livestock keepers would have to actively seek these out. It would be beneficial if livestock owners were to somehow have training or information easily available to help them identify behaviours or clinical signs that indicate when it is time to take action. Some farmers would also benefit from improved training on shot placement and the most suitable type of ammunition.

15. Vets could also provide training and competence sign off for their clients. Red Tractor and other herd health plans detail routes of disposal and define who is capable of carrying out the process of on-farm killing. Under Red Tractor requirements all stockpersons carrying out emergency euthanasia have to have been trained and be assessed by a vet.

16. We have received reports that in some areas there are slaughterhouse operators who actively go on farm looking for chronic lame cows, telling the farmer that the vet would sign these off as On Farm Emergency Slaughter and that they will be accepted at the abattoir. These animals are currently ineligible for On Farm Emergency Slaughter but such practice is in some circumstances placing vets in a difficult position, and creates conflict.

17. Regular monitoring is not currently carried out and would be difficult in view of current levels of Trading Standards resource. Monitoring is also not pre planned (unless in relation to a wide scale depopulation).

18. Perhaps trigger points could be built in, so that numbers killed (on a monthly basis and dependant on species) would invoke some line of communication and potentially a visit. The number of animals killed could also be adopted as a risk assessment indicator, to check as part of mandatory farm visits.

→ Question Four
Are there obstacles to effective euthanasia?

19. We regard the main obstacles to effective euthanasia as:
   - The potential limitations of operator competence
   - Availability of other licenced operators (if the original operator is judged incompetent)
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- The volume of operations

- **Question Five**
  
  *Can you cite examples of best practice?*
  
  20. We do not have examples of best practice.

- **Question Six**
  
  *Is more guidance/inspection/enforcement needed and, if so, how should this be achieved?*
  
  21. The [Humane Slaughter Association](http://www.humaneslaughteraustralia.org) guidance (written guides and videos) mentioned above is very useful and should be promoted. It may also be beneficial to farmers to have more widely available guidance relating to humane destruction (for non-human consumption), possibly provided by NFU or FAWC.

  22. Guidance has already been issued about emergency on-farm slaughter, following a recent FSA consultation regarding the certification process for emergency on-farm slaughter. The reinforcement of messages surrounding eligibility criteria may be beneficial to manage client expectations.

  23. We note that the FSA has also provided guidance on home slaughter and how to dispose of the animal by-products. We would query whether there should be a requirement to notify the FSA about home slaughter.

  24. The [Casualty Pig Book](http://www.casualtypigbook.org) is available to all on the PVS website:

  25. Red Tractor standards for on-farm killing are available to all under section AH7 of [http://www.assuredfood.co.uk/resources/000/618/002/RT_Pigs_Standards_V2_01_b.pdf](http://www.assuredfood.co.uk/resources/000/618/002/RT_Pigs_Standards_V2_01_b.pdf)

  There is Red Tractor work instruction for on-farm killing available [AH.7.4 Documented Work Instruction for Euthanasia](http://assurance.redtractor.org.uk/resources/000/870/361/Documented_Work_Instruction_Guidance_Note__April_2013.pdf)