

# Sub-group on the protection of animals at the time of killing

Third meeting, 30/05/2022  
(Videoconference)

## - MINUTES -

### Attendance

<b>Independent expert</b>	Birte Nielsen
<b>Civil society organisations</b>	Eurogroup for Animals Compassion in World Farming
<b>Business and professional organisations</b>	UECBV FVE European Meat Network
<b>Member States</b>	Denmark Spain Netherlands Sweden Ireland
<b>European Commission</b>	Denis Simonin SANTE G5 (Chair) Christian Juliusson SANTE G5 Vasco Antunes SANTE F2
<b>Guest(s)</b>	AVEC (3 persons) EY (contractor for the impact assessment study)

### Discussions

The meeting was only dedicated to waterbath stunning.

#### 1. Presentation by AVEC

One AVEC representative presented their views about the problems and the perspective of waterbath stunning (see attached)

#### 2. Questions and Answers session following the AVEC presentation

One question related to the detection of dead-on-arrival with the gas method. The AVEC confirmed that there was a risk with the gas method of missing animals dead-on-arrival because chickens are hanged

after being unconscious which is not the case for waterbath stunning. However, the Chair said that this problem is usually overcome easily at the post-mortem inspection because the aspect of the carcass is different.

There was an exchange related to the risk of electric pre-shocks with the waterbath stunning. AVEC considered that the risk does not exist anymore due to a better design of installation.

AVEC said during the presentation that the method has been vastly improved. In relation to this, someone wanted to know more precisely on what kind of improvements has been implemented. According to that member, there was no noticeable changes in the practice of waterbath stunning since 2009. AVEC referred to extra-measures taken in Denmark, without further details to substantiate their point of view.

Another member wanted to know if flexible shackles (i.e., able to adapt to different size of legs) was common and if there was method to adjust for the difference in impedance of animals. An AVEC representative said that flexible shackles were not common because most slaughterhouses slaughter standard broilers. Such installation exists mainly in small slaughterhouses working with various of types of birds.

AVEC explained that more than 90% of poultry slaughterhouses use today waterbath stunning and, as they see it, there is a serious risk of disappearance of small and middle size slaughterhouse if the method was to be banned. They fear that it would also affect the transport of birds, since slaughterhouses would disappear from certain regions, leading to transport birds over longer distances.

The guest also added that waterbath stunning, as it is now, is the sole method accepted for the halal market and it will affect the price for all consumers. Some parts (like wings) are not bought by mainstream consumers and exported to Muslim markets. They contribute to lower the price of poultry meat in the EU. AVEC informed the group that are presently collecting information on the use of waterbath stunners by their members to have more precise quantitative data.

There was then a discussion regarding the costs of gas stunning vs waterbath with the recent increase in electricity prices. According to AVEC, the price of carbon dioxide has also increased and does not make gas stunning more economically attractive.

AVEC recognised that as regards shackling waterbath stunning is not ideal, but they consider that there is no perfect method. According to them, the problem of shifting to gas is not only a matter of costs but also of space, gas stunning needing more room to operate.

One member said that small gas stunner setups do exist in small slaughterhouses, and it can work very well, so the question of size of the slaughterhouse can be overcome. AVEC confirmed that small gas stunners can be installed but, for them, there is still a huge difference in costs because  $\frac{3}{4}$  of the costs in shifting is due to the cost of buying new containers (the whole stock of containers have to be changed, whatever the size of the slaughterhouse).

One member declared that despite possible improvements like the installation of breast comfort plates, they did not see any of them in practice in existing slaughterhouses.

AVEC replied that improvements directly depend on the individual situation of each slaughterhouse. Some would put breast comfort plates, others will shorten the shackling time, others will improve the light, etc. Animal welfare contains several dimensions, and it should be considered globally.

### **3. Problem definition**

The Chair presented (see attached) some elements of the problem definition for discussion.

One member considered that shackling time should be added as the maximum of one minute in the legislation is far too long. There is also the problem of birds missing the neck cutter, then possible entering in the scalding tank still conscious.

Another member said that there is also the problem of different size of animals in the same batch of birds making the stunning inefficient for some of them. In addition, many shackling lines are still not designed to give access to the birds (in case of problem) at all parts of the line.

One guest replied that there is always checks after bleeding to prevent conscious birds entering into the scalding tank.

A member said that waterbath is too easy to be tampered and make parameters not sufficient to stun. Maintenance is also problematic and should be done for each session and standardised.

Another member pointed out that the method makes it difficult to differentiate between proper stunning and electro-immobilisation. The slaughter lines are too fast to really check if animals are properly stunned. The Chair confirmed that according to EFSA, beyond 8000 birds per hour, checking birds for sign of unconsciousness is practically not possible. One guest disagreed and said that this is perfectly feasible if you put enough staff to do the checks.

#### **4. The baseline**

The Chair presented some points for the baseline to be discussed (see attached).

One member considered that improved education could improve the situation for waterbath. Others reacted by reminding that a certificate of competence is already required by the legislation and not much change should be expected on this point. In fact, after ten years of implementation, very few certificates are withdrawn.

One guest declared that the roles of the animal welfare officer is crucial to assess the behaviour of birds. It is essential to adjust the different parameters every day because changes in the environment and the types of birds. The guest also insisted on the fact that personnel shackling the birds are very attached to their work and do not want to change to other posts.

#### **5. The option and its impacts**

##### Description

The Chair presented the way the prohibition could be introduced with an immediate measure for newly built facilities and a transitional period at the end of which all establishments would have to comply.

The remaining methods would then be gas stunning, head-only electrical stunning and low pressure atmosphere stunning.

##### Impact on the problem

A member mentioned that head-only would not address the shackling of birds but since animals are shackled in cones, the inversion would be less painful. In addition, the member declared that head-only seems to have better meat quality.

Another member referred to the head-only developed in NL in 2017 but it seems that after several trials in 2019, the method faced various technical problems and did not deliver good animal welfare performances.

A member concluded that head-only does not constitute a real alternative to waterbath stunning. Another member declared that LAPS was not used in the EU.

A guest said that further development for head-only stunning should be encouraged but the method was not effective beyond 8.000 birds per hour. In addition, it is not clear if it is working well. The guest concluded that we should not adopt legislation to ban a method without an available commercial alternative.

##### Other impacts

A member mentioned that the ban on waterbath will affect the religious communities that accept only this method (but not gas stunning).

Other members said that gas stunning could be also reversible. The Chair replied that this might bring new problems since gas stunning would not be as effective if lower parameters would be applied (same as waterbath). In any case, the question would directly depend on the religious communities concerned to accept or not another method, something that would be very difficult to do at EU level.

#### **6. Refining the option**

The Chair presented possible refinement of the option by adjusting the transitional period, by offering a derogation for small slaughterhouses or/and by adding new requirements (like having a lower maximum frequency or excluding heavy birds).

One member considered that waterbath stunning has a variety of steps with direct negative effects on animal welfare. This member believed that there are too many welfare problems to continue trying to improve the method. The best way would be to ban the method and focus on methods with less negative impacts on animal welfare.

One guest declared that excluding heavy birds (for waterbath) would not work because gas stunning is designed for broilers and waterbath is the sole method used for big birds like parent flocks or turkeys. The guest continued by saying that we need to keep waterbath so that the different regions of Europe are

properly covered. In addition, there is no real alternatives for both the EU and the export markets. The guest stated that 95% of the poultry in the world are slaughtered with waterbath stunning. The guest confirmed that it is necessary for the religious market.

One member proposed that we could establish different transitional periods between big and small slaughterhouses and in the meantime, we should improve the current method, notably by reducing the maximum frequency as proposed by EFSA. We should also consider economic incentives to face the changes.

Another member said that the issue of transition is not new but there are technical solutions that have been implemented in the UK for small slaughterhouses, including for turkeys. The member hence agreed that we should stop keeping this method.

Another member concluded that there are no practical alternatives for small slaughterhouses, but the legislation already establishes clear obligations of results. In addition, a ban would lead to long distance transport for poultry.

A guest confirmed that some manufacturers can offer small gas stunner, but this still not work for heavy birds because the conveyor belt is designed for a limited range of live weights. On the other hand, waterbath is easily adjustable in height making the system for flexible. Finally, the guest reminded that gas stunning is not authorised for ducks and geese, and we therefore need to keep waterbath for those species.

The Chair concluded that while qualitative assessment of impacts is useful, we need as much as possible quantitative data to evaluate the impacts in magnitude if waterbath stunning was to be banned. The Chair, hence, invited the members and the guests to provide as many as possible references to support their views. These data will allow the contractor preparing the study for the impact assessment more robust.

## **7. Calendar for the next meeting and any other business**

The next meeting will be held on 20 June and dedicated to the options on electrical prods. It will be prepared by one member.

One member asked if it was possible to also discussed the issue of CCTV (close circuit TV) in slaughterhouse.

The Chair suggested that other points could be raised but we should primarily focus on work on the options proposed initially. The point could be shortly discussed at the next meeting if time allows it.

