

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

Fourth meeting, 20/06/2022
(Videoconference)

- - MINUTES - -

Attendance

Independent expert	Birte Nielsen
Civil society organisations	Eurogroup for Animals Compassion in World Farming (excused)
Business and professional organisations	UECBV FVE European Meat Network
Member States	Denmark Spain Netherlands Sweden (absent) Ireland
European Commission	SANTE G5 (Chair) SANTE G5 SANTE F2
Guest(s)	EY (contractor for the impact assessment study)

Discussions

1. Problem definition on the use of electrical prods

The UECBV member presented successively the problem definition, the baseline, the option and how to refine the option on electrical prods (see attached presentation).

The use of electrical prods creates an acute pain and stress to the animals. The legislation regulates their use but lacks clarity in some aspect. It does not define what how it should be avoided “as far as possible”, nor the “room ahead of them”. The use of electrical prods is also related to the need for individual restraint for some stunning methods (captive bolt, electrical head-only stunning).

Furthermore, electrical prods are used because animals refuse to move for various reasons. Slaughterhouses are always a new environment and hence stressful for an animal that arrives. It is more

alert to any unknown elements and prone to stop. In addition, bovine animals and pigs are gregarious animals and do not like to move in a single lane. Finally, each animal has its own history as well as has its own character, making the use of electrical prods sometimes necessary.

Based on this presentation of the problem, members reacted.

One member mentioned that the animal welfare issue is not only limited to the pain involved but also linked to the fact that the use of electrical prods is not predictable. Animals lose a sense of control, increasing the stress already induced.

Another member mentioned that the Commission produced an interpretation letter on what is an adult pig (stating that slaughter pigs were not adult pigs and so electrical prods should not be used with them). The Chair confirmed the interpretation but said that the Commission has not a final authority in interpretation of EU law and hence the lack of clarity persists.

The Chair also asked the group if some drivers like the lack of proper design of the slaughterhouse and the pressure to work fast should not be mentioned.

One member confirmed that the pressure to work fast was in all slaughterhouses either due to the way personnel was paid or because it allows the personnel to leave work earlier.

The same member also drew the attention of the group to the fact that the legislation forbids any type of procedure inflicting pain (referring to paragraph 1.8 of Annex III) apart from electrical prods. For this member, the justification of their use has become obsolete. Better design of slaughterhouses should have been achieved today.

Another member agreed with this but still considered that it does not exclude the problem of individual animals that balk for unknown reasons, nor the problem linked to individual restraint.

Another member referred to the need to use electrical prods for downers as well as for the safety of workers.

Another member referred to the usefulness of standards operating procedures (SOPs) on the use of electrical prods. However, this member considered that in absence of supervision, the effects of SOPs remain limited. Bad design and insufficient training remain important source of excessive use of electrical prods.

Another member confirmed that lack of proper understanding of animals' behaviour is an important source of abuse of electrical prods. For this member, the use has been reduced considerably due to pressure from consumers. The member confirmed the importance of the design and the understanding of the personnel in decreasing the use of electrical prods. The member also considered that the use of electrical prods is forbidden on downers animals.

Another member mentioned that some slaughterhouses have stopped their use totally and there is no problem to replace them completely if the personnel is properly trained.

Another member agreed and considered that there is no evidence of security issue related to the absence of use of electrical prods.

2. The baseline on the use of electrical prods

According to the UECBV member, the baseline is a reduction of its use.

As previously stated, in the last ten years, their use has been notably reduced due to better design of the premises and better training of the personnel. Private standards have also contributed to reduce and monitor its use with new instruments, which can automatically count the number of shocks delivered.

There are no comprehensive data on the level of use in the EU but based on anecdotal evidence some slaughterhouses have reduced their use by 70% in five years due to monitoring.

A member confirmed that big Dutch pig slaughterhouses (using gas stunning) have totally stopped their use since the topic attracted a lot of public criticism, not only in slaughterhouses but also during transport and on farms [but no data published]. The same member, however, specified that stopping their use is more work intensive and may have an impact on the safety of workers.

Another member agreed that the reduction of use is mainly for pigs where individual restraint is not used. The use in cattle has reduced too but not completely.

A member argued that the use of electrical prods will not completely disappear because it is necessary for stubborn animals and not using prods would expose workers to more physical injuries due to the necessity to get closer to the animals.

3. Impacts on banning the use of electrical prods

A member stated that we need more data to evaluate the impact of stopping the use of electrical prods. If their use was systematically recorded, we would have more data to understand under which circumstances it is still used. This would help us in defining the exceptional circumstances under which it could be still permitted.

Another member disagreed and considered there is no justification to keep such practice. Their use is already banned for horses, while we use individual stunning, and the issue of workers safety has not been confirmed.

A member asked whether all electrical prods are equipped so that data can be collected (just like head-only stunning devices) for the number of electrical shocks, the current, voltage and duration. These data could be used to refine application of these shocks. Another member replied that some prods come with automatic counters (and timestamps) of number of shocks emitted.

The Chair said that it would be interesting to know if we have data on the workers accidents in slaughterhouses and if there was any relationship with the absence of use of electrical prods.

Another member agreed that it should only be used under exceptional circumstances.

A member concluded that blocking situations will never completely disappear and the use of electrical prods need to be authorised, even with further restrictions. Design of premises will never be perfect; animals will never be totally at ease in slaughterhouses, and we need to ensure physical and psychological safety to workers.

4. Refining the use of electrical prods

The presenter proposed to refine the option by suggesting more precise rules on the use of electrical prods (see presentation).

There was a discussion on the possibility of defining some electrical parameters to prevent painful shocks. One member said that some devices are designed to deliver fixed current with the possibility to deliver lower currents.

Another member confirmed the need to collect more data before implementing a total ban.

A member proposed that operators should demonstrate that they use electrical prods as less as possible through monitoring.

It was also proposed to define a minimum space between shocks like a minimum of three seconds.

This report includes in Annex contributions from members on electrical prods sent after the meeting.

5. Simplification of some requirements for small slaughterhouses

A member presented a series of proposals for small slaughterhouses to reduce administrative burden.

Small slaughterhouses are defined in Article 17(6) of Regulation 1099/2009 and correspond to very small slaughterhouses with usually one or two workers operating few days per week. They have no welfare officer nor permanent official inspection.

As a paradox, while there is no explicit obligation in the legislation to record monitoring procedure for stunning (Article 16), some official veterinarians asked records of such monitoring because they perform inspections occasionally. The member hence proposed that the legislation explicitly exclude small slaughterhouses from such recording.

Similarly, the same member explained that there is obligation to record stunning equipment maintenance and calibration, while it is easier in a small establishment to check directly that the equipment is working well than looking at papers. In addition, the same member said that due to manufacturers failure to deliver the information on maintenance and calibration, small slaughterhouses have difficulties to refer to manufacturers' instructions. Another member added that however, maintenance and calibration are vital to prevent tampering with electrical current settings and delivering electrical shocks with higher voltages due to equipment malfunction. Hence the importance of recording data from these devices. Maintenance and calibration are also vital for health and safety reasons.

Finally, the same member proposed to exempt small slaughterhouses from the requirements of indication of date and time of arrival of animals as well as the maximum number of animals (paragraph 2.3 of Annex

III), since such information can be easily check at the desk and risk of confusion is limited due to the small size of the establishment.

One member argued that this last requirement should also be dropped for big slaughterhouses since this information is usually centralised and easier to check than on site. However, the member disagreed since this information is always centralised but, in larger slaughterhouses, such information is useful on site to perform the checks.

This report includes in Annex one contribution from a member on simplification sent after the meeting.

6. Use of CCTV in slaughterhouses

A member mentioned that CCTV (close circuit television) was compulsory in the UK (Scotland and England, but soon in Wales) and it would be good to hear the subgroups views and experiences with CCTV in slaughterhouses.

The Chair wanted to understand the underlying reason to use CCTV. He supposed that it is mainly to improve the level of supervision of areas not subject to permanent inspection.

One member suggested to invite a person from DELOITTE, a company that has developed artificial intelligence for analysing video materials and detecting mishandling.

Another member referred to a position paper of 2018 done by the FVE which was based on wide consultation of its members. In some countries the requirement for CCTV did not lead to any legislation because of privacy issues and the fear of the Unions that it would be used for controlling staff rather than animal welfare.

A member said that, in Denmark, CCTV was widely used in slaughterhouses due to consumer pressure (but no data available). The analysis of data by artificial intelligence is developed by several companies in Europe.

Another member mentioned that experimentation was also started in France on a voluntary basis, but the current legal framework requires an agreement at individual company's level due to the social aspects.

Another member declared that the Irish authorities conducted a survey on this issue, and it appeared that 92% of the slaughterhouses were using CCTV [unpublished data] mostly for animal welfare purposes. The member declared that the use of CCTV requested a precise purpose to be in line with the GDPR regulation (privacy rules).

Another member mentioned that Spain will soon adopt legislation on this topic following the request of the sector. These rules will contain transitional period for small slaughterhouses. The draft rules were notified to the Commission last year.

7. Calendar for the next meeting and any other business

The Chair concluded the meeting by calling all members to provide as much as possible published references to help the contractor in building a robust impact assessment.

The next meeting on 19 September will be dedicated to the option of banning the use of carbon dioxide at high concentration for the stunning of pigs. The company MAREL has been invited to present their views on the subject.

The meeting of 26 October and 23 November will be dedicated to the two last topics (fish stunning and the killing of day old chicks).

Annex

Contributions from members on electrical prods and simplification after the meeting

On electrical prods

Contribution 1

Below there is a collection of some scientific references related to the use of electric prod and its detrimental effect on animal welfare (pigs and cattle)

The use of electric goads for moving pigs has been shown to increase heart rate, blood lactate, and salivary cortisol concentrations.

- Hemsworth PH, Barnett JL, Hofmeyr C, Coleman GJ, Dowling S, Boyce J. The effects of fear of humans and pre-slaughter handling on the meat quality of pigs. *Australian Journal of Agricultural Research*. 2002;53(4):493-501

- Correa JA, Torrey S, Devillers N, Laforest JP, Gonyou HW, Faucitano L. Effects of different moving devices at loading on stress response and meat quality in pigs. *Journal of Animal Science*. 2010;88(12):4086-93.

as well as the incidence of fatigued pigs

- E. BM, W. GH, J. ID, F. RL, J. JD, R. WJ, et al. Effect of animal handling method on the incidence of stress response in market swine in a model system. *Journal of Animal Science*. 2001;79:279.

Grandin Temple n 'Improving animal welfare: a practical approach. Grandin T, editor 2009', found that prods using electric goads to force livestock to move results in increased stress, fear of humans and poorer meat quality.

An abattoir study in Argentina compared two matching groups of 20 steers that had been lairaged overnight. The group subjected to electric prods showed poorer welfare condition based on blood samples tests revealing higher plasma glucose, lactic acid and total protein concentrations

- Pighin DG, Davies P, Pazos AA, Ceconi I, Cunzolo SA, Mendez D, et al. Biochemical profiles and physicochemical parameters of beef from cattle raised under contrasting feeding systems and pre-slaughter management. *Animal Production Science*. 2015;55(10):1310-7.

Moreover, electric goads have been shown to reduce the ease of pig handling: faster movement compared with paddles and compressed air prods, BUT deemed to be more aversive

- Rabaste C, Faucitano L, Saucier L, Mormede P, Correa JA, Giguere A, et al. The effects of handling and group size on welfare of pigs in lairage and their influence on stomach weight, carcass microbial contamination and meat quality. *Canadian Journal of Animal Science*. 2007;87(1):3-12.

- Correa JA, Torrey S, Devillers N, Laforest JP, Gonyou HW, Faucitano L. Effects of different moving devices at loading on stress response and meat quality in pigs. *Journal of Animal Science*. 2010;88(12):4086-93

Additional research is necessary to identify methods to improve moving of animals with alternative tools without compromising animal welfare. It is clear that low-stress handling practices and training of stock persons can have a significant positive effect on animal welfare and behaviour. This is an interesting study that analysed the relationship between beliefs, attitudes and observed behaviours of abattoir personnel in the pig industry. Researchers found

that a positive stockperson attitude was associated with use of an electric goad with the power turned off, while negative attitudes were associated with use of the goad with the power on

- Coleman GJ, McGregor M, Hemsworth PH, Boyce J, Dowling S. The relationship between beliefs, attitudes and observed behaviours of abattoir personnel in the pig industry. *Applied Animal Behaviour Science*. 2003;82(3):189-200.

Contribution 2

EFSA in "Welfare of cattle at slaughter" on page 29, states that "The use of electric goads causes pain and leads to aversion (Pajor et al., 2000) and is considered a serious welfare concern."

Pajor EA, Rushen J and de Passill AMB, 2000. Aversion learning techniques to evaluate dairy cattle handling practices. *Applied Animal Behaviour Science*, 69, 89–102

On simplification (only one contribution)

- Proposal to exclude small slaughterhouses from recording monitoring of stunning.

In my opinion, there is no obligation to record these controls for any slaughterhouse, so excluding small slaughterhouses can be interpreted as meaning that large slaughterhouses have to do so. This can also lead to the confusion that there is no need for any record, and it is usual that in order to determine whether the results shown by the indicators are satisfactory, periodic evaluations are carried out which require records to be kept, e.g. if the effectiveness of the first shot falls below 95%, measures must be taken to solve the problem.

- Proposal to exempt small slaughterhouses from the record of maintenance of restraining and stunning equipment.

This is a periodic check that can be done once a year, for example, and is normally done by an external company that fills out a document, which is the record. It does not seem to me to be an excessive bureaucratic burden for a small slaughterhouse and there is a risk that the equipments will not be checked.

- Proposal to exempt small slaughterhouses from the requirements of indication of date and time of arrival of animals as well as the maximum number of animals (paragraph 2.3 of Annex III), since such information can be easily check at the desk and risk of confusion is limited due to the small size of the establishment.

In my view, this information is useful also for small slaughterhouses. It is relatively frequent (at least in my country) grouping animals in order to slaughter them at the same time but arriving in different days (it is more profitable for local butcheries). In my country, the authorities have recently elaborated an interpretative document on the term "slaughtered without undue delay" stated in Regulation 1099/2009, so that the 48 hours from the arrival at the slaughterhouse are not exceeded. It is useful to know the information on paragraph 2.3 of Annex III in any slaughterhouse. I do not think it is a high administrative burden for the operator and it facilitates official control.