

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

Second meeting, 25/04/2022

(Videoconference)

– MINUTES –

Attendance

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

Discussions

The meeting was only dedicated to restraining and stunning equipment. The Commission presented slides to each section of the discussion. In parallel, a member of the group prepared slides that will be available on the digital tool as an additional input for the discussion.

1. Problem definition

The group agreed with the list of problems presented by the Commission. However, some members added the following points:

Some animal welfare problems occur because **equipment is not used as it was originally designed**. Slaughterhouses increase the throughput or use equipment for animals of different categories, increasing risk of inadequate animal welfare outcomes.

The development of equipment are mainly initiated by manufacturers without much involvement of other stakeholders increasing the risk of neglecting the welfare aspects against other aspects like the speed of the slaughter line or meat quality.

Electrical equipment are particularly exposed to bad welfare outcomes because they are complex and difficult to assess. Some equipment needs to be adapted to different species and would need validation and calibration before being used. The technical knowledge of veterinary officials is often too limited to investigate such issue (and they also lack time).

Slaughterhouse operators often **neglect maintenance and calibration** by ignoring it or assigning the task to unqualified personnel to save money.

While these problems of calibration and maintenance are particular acute for electrical equipment, they are also **valid for mechanical stunning equipment** too.

Members confirmed that:

- authorities have difficulty to correct equipment defects because **manufacturers are not based in the countries** where equipment is installed.
- manufacturers often **ignore to comply with the provisions of Article 8 of Regulation 1099/2009**.
- when instructions are available, they are not always available in the national language where the equipment is used.

In absence of common requirements for valid equipment, standards on animal welfare performances vary considerably depending on the price.

2. The baseline

The group agreed that without EU action, problems will not evolve positively for the welfare of animals. Discrepancies between Member States will continue and the market will tend to favour cheap equipment against well designed ones.

However, some members believe that for new equipment and in some countries the situation evolve positively as slaughterhouse operators are more aware of consumers demand on animal welfare. Other members tend to disagree and consider that sellers claim compliance to the welfare legislation without performing any serious scientific assessment.

There are also conflicting demands between animal welfare and other aspects like meat quality. Electrical head to body for cattle is almost not used in the EU because it affects the quality of the carcass.

Finally the pressure of consumers is not only limited geographically. Consumers are reluctant to be interested in the stunning/slaughter process because they feel uncomfortable about the principle of killing animals for meat. The pressure for improvement is therefore unlikely to be sufficient against economic interests pushing for a faster process and better meat quality.

3. Pre-approval at Member State level

Description

A member wanted to clarify meaning of the wording "pre-approval" against "approval". In its reply the Commission proposed to understand that the system, whatever the wording, would work like a certificate as it is requested for personnel. The obligation will remain on the slaughterhouse to provide a certificate of approval established by the national scientific support. This obligation would be created because the present legislation (which create direct obligation to manufacturers) does not work in practice. Slaughterhouse operators will then represent a simple point of control. However, it will indirectly create an obligation for sellers and manufacturers to comply through the grant of a certificate.

The question that remains undefined for now would be the scope, the timing and the minimum requirements to grant a certificate.

In term of scope, various possibilities may be envisaged like covering all pieces of equipment installed or rather some kind of "type approval" (similar to vehicles), applicable to all or only new equipment and renovated ones.

In terms of timing, the requirement for certificate could apply first to newly installed equipment and then to all of them after a transitional period.

In terms of requirements, the minimum should be an assessment on the criteria laid down by the point of Article 8 of Regulation 1099/2009 and possibly more (like training programme or easiness to use for operators).

Impact on the problem

The group agreed that such option would certainly have positive impacts to solve the problem. It should have a positive impact for animals and ease the work of local inspectors.

However, the magnitude of the impacts will largely depend on various factors:

- The level of competence of the national scientific support,
- The scope (bigger scope = bigger impact)
- The level of details of the requirements (more details = more positive impact).

However, the positive impact might be limited by the practical feasibility of such measure.

Other impacts

Some members of the group pointed out that a wide scope might create **excessive administrative burden**, increase the costs for manufacturers and especially **affect negatively SMEs**, which will have not enough resources to carry out such assessment.

It might also **hamper innovation** due to time consuming procedures and the necessary adaptation due to local context.

A system of “type approval” certificate will not solve the improper use of equipment, the possible changes made locally and the necessary need for follow up (training and maintenance).

Some members would be more inclined to support a requirement for **certified sellers or manufacturers**.

The effectiveness of the measure will also depend on the national resources and today there are discrepancies in that regard between Member States.

The debate is also the extent to which it is possible to check already installed equipment and the ones that are locally modified. Some members would consider more feasible to only require approval for new equipment, excluding ones already installed or locally modified. Other members objected because most of the problem today lies with existing equipment locally modified without proper consideration for welfare.

Other members argued that there is for cattle a need for local adaptation as the type of animals may vary considerably between regions.

Pre-approval at EU level

Description

The option is similar to the previous one but the certificate would be delivered by the Commission after assessment by the relevant EU reference centres.

One of the member considered that the present setting of EU centres by species is not adequate for slaughter equipment because some of them are common between species and the issue is very technical. In that context, the member suggested to create a specific EU centre dedicated to slaughter and killing issues.

Impact on the problem

The impact of this option is rather similar to the previous one with one additional advantage. With an EU approval system, there will be a more harmonised approach, avoiding manufacturers to apply to the least requiring Member States for getting a certificate.

Other impacts

Similar to the previous option. However, a centralised EU system might face additional administrative burden and lengthy procedures, making the effect on SMEs and innovation even more negative.

4. Refining the options

One of the member suggested that a certificate of approval could be granted at Member States level but with much more EU detailed rules (or guidelines prepared by the EU reference centres) so that the scope remain wide without facing the risk of complicated and long procedures.

Another member suggested that only new installation of equipment would be submitted to an EU certification, while existing ones would be subject to a Member State approval (to be clarified).

It was also suggested that the certificate of approval could only be required for electrical stunning equipment where issues of maintenance and calibration are the most problematic.

5. Calendar for the next meetings and assignments of tasks

The next meeting on 20 June will be dedicated to the options on electrical prods and will be prepared by one member of the group. The Commission asks to receive the presentation at least one week in advance.

Waterbath stunning will be presented at the meeting of 30 May with the possibility to invite AVEC for the presentation (one member of the group will contact them). Another member will present an alternative system of head-only for poultry ("Dutch vision").

Annex

List of topics to be explored

SUBGROUP ON ANIMAL WELFARE AT THE TIME OF KILLING

Structure of each topic to present the debate

- What is the problem to be addressed by the option?
- What is the content of the options?
- Which alternatives have been implemented?
- What are the possible main impacts?
- How to mitigate negative impacts?
- Other options to address the problem?

Options to be discussed

1. Pre-approval for restraining and stunning equipment (EU or national)
2. Electrical prods
3. Simplification of small slaughterhouses
4. Carbon dioxide at high concentration for pigs
5. Waterbath stunning for poultry
6. Farm fish
8. Prohibiting the killing of day old chicks
9. Other options [if any proposed]