

## **Note**

### **concerning measuring of tail damage at the slaughterhouse**

#### **Preliminary remarks**

The organisation European Meat Network (EMN), which include members from the biggest slaughterhouses in the EU as e.g. DANISH CROWN, VION and TØNNIES, recognizes the need to improve the situation concerning tail biting/docking of pigs. From an animal health and welfare perspective there are several arguments that address the need to act. The Animal Welfare Platform has by creating a sub-group on "pig welfare" asked the sub- group "initially to consider how the risk of tail biting can be reduced" cf. the mandate for the group. The AWP has by this decision taken a first step to improve the welfare for pigs on tail biting.

We have a difficult situation with tail docking/ tail biting across the European Union, where the legal situation is that 26 member states do not fully comply with the EU-rules in relation to tail docking. The issue of tail docking is complex and easy solutions are not found overnight. It must therefore be foreseen that it will take time for producers and member states to meet the legal requirements according to the EU-rules. To be successful in this process it is important to accept that you need to take small steps forward with a high level of involvement of the directly involved stakeholders like the slaughterhouses and the pig producers. It is crucial that a harmonized approach is agreed upon across member states to secure a level playing field and at the same time ensure a simple, realistic, practical and economically feasible solution.

EMN would like to introduce a proposal to an approach for measuring tail damage at the slaughterhouses to support a successful change towards raising pigs with entire tails.

#### **Tail damage measuring serves two goals**

EMN recognizes that the measuring of tail damage at the slaughterhouse have two goals:

1. Measure the progress towards raising pigs with intact tails at member state level
2. Measuring of tail damage for feedback purposes to the pig producers

However, EMN finds that there are several different methods to reach these goals and it is important that slaughterhouses at member state level are given the opportunity to develop their own methods in close collaboration with the producers. Slaughterhouses across the Union differ in size, construction and ownership structure and there are many ways to establish measurement of tail damage at the slaughterhouse.

*EMN will encourage that a clearer distinction between the goals is introduced and that it is accepted that there can be several ways to achieve both goals. EMN will also stress the importance of giving slaughterhouses the opportunity to develop their own methods in close collaboration with the pig producers.*

#### **Measure the progress towards raising pigs with intact tails at member state level**

EMN supports the need to monitor the progress of pigs raised with intact tails at member state level but will also underline the fact that these data can be collected in many ways. One solution could be a screening of pigs on the slaughter line. Another solution could be a system where producers report the number of pigs with intact tails prior to slaughter e.g. as part of the food chain information or in relation to special contracts. Finally, data could be collected by carrying out random screening across the slaughterhouses.

*EMN suggests that the need for monitoring the progress of pigs with intact tails are incorporated into the national action plans and that member states are given the task to ensure that each slaughterhouse develops a system or model for collecting these data.*

### **Measuring of tail damage for feedback purposes to the producers**

EMN also sees the need for feed back to the producer in cases where the prevalence of tail damage is high or severe to support producers to reduce tail lesions and the need to tail dock. However, EMN would like to stress that it is important that the responsibility of animal welfare is in the hands of the food business operators in terms of feed back to the pig producers.

*EMN suggests that the need for measuring ail damage for feedback purposes are incorporated into the national action plans and that member states are given the task to ensure that each slaughterhouse develops and implement a model for feedback to producers.*

### **Definition of tail damage and threshold**

EMN supports the proposal to agree on a common definition of tail damage. However, it must be taken into consideration that research have shown that tail damage prevalence at the slaughterhouses does not reflect (and will in many cases underestimate) the actual level of tail injuries on the farms. In addition, many severe tail injuries will never be recorded at the slaughter house as the rules of fitness for transport of pigs will not allow pigs with major tail injuries to be transported to the slaughterhouse. Therefore, registrations at the slaughterhouse can only be used as an indicator for the level of tail injuries and cannot be used as a threshold.

EMN will again underline the need to develop a very simple definition of tail damage and only focus on two categories in terms of minor and major tail injuries. Today registration of tail injuries is already a requirement for food safety reasons at the slaughterhouses and experience shows huge challenges in relation to calibration routines even with simple definitions. EMN will also underline that it is important to include inflammation/infection in the tail damage definition. The size of the wound cannot stand alone as an indicator and the presence of inflammation / infection is also important in relation to food safety.

*EMN suggests that a proposal to a definition of minor and major tail damage is developed and that a broad range of stakeholders are consulted to the proposal. In the future- when the number of pigs with intact tails have increased across the European Union- it might be considered to extend the proposal with a definition of tail length. But for now it is important to keep a simple approach.*

### **Practical animal welfare indicators in abattoirs**

In the document (revised version 1/7/2019) it has been proposed that the Commission Services utilise Art 21 (8) of regulation 2017/625 to implement the requirement for practical animal welfare indicators at the slaughterhouses.

EMN finds that the existing legal instruments for meat inspection for both food safety, animal welfare and health purposes can be used to ensure measuring of tail damage at the slaughterhouse. The challenge for many slaughterhouses is not legislation but to find a simple, realistic, practical and economically feasible solution to measure tail damage. Increased administrative burdens in terms of new legislation will not be helpful in the process of supporting a successful change towards raising pigs with entire tails.

*EMN finds that the existing legal instruments for meat inspection for both food safety, animal welfare and health purposes can be used to ensure measuring of tail damage at the slaughterhouse instead of introducing new legislation and administrative burdens on the European slaughterhouses.*

-----