



EUROPEAN COMMISSION  
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL  
Directorate F - Food and Veterinary Office

DG(SANCO)/2007-7330 – MR Final

FINAL REPORT OF A MISSION  
CARRIED OUT IN FRANCE  
FROM 12 TO 16 FEBRUARY 2007  
IN ORDER TO ASSESS ANIMAL WELFARE  
AT SLAUGHTER

*Please note that factual errors in the draft report have been corrected. Clarifications provided by the French Competent Authorities are given as footnotes, in bold, italic, type, to the relevant part of the report.*



## TABLE OF CONTENTS

1. INTRODUCTION.....	4
2. OBJECTIVES OF THE MISSION .....	4
3. LEGAL BASIS FOR THE MISSION.....	4
4. BACKGROUND.....	5
5. MAIN FINDINGS.....	5
5.1. Competent authority .....	5
5.2. Legislation .....	6
5.3. Controls in slaughterhouses.....	6
5.4. Killing for disease control purposes .....	11
6. CONCLUSIONS .....	13
6.1. Overall conclusion.....	14
7. CLOSING MEETING.....	15
8. RECOMMENDATIONS .....	15
9. COMPETENT AUTHORITY RESPONSE TO THE RECOMMENDATIONS .....	16

## **EXECUTIVE SUMMARY**

*This report describes the outcome of a mission carried out by the Food and Veterinary Office (FVO) in France, from 12 to 16 February 2007.*

*The objectives of the mission were to evaluate the measures taken to ensure that the requirements for animal welfare at the time of slaughter and killing in Council Directive 93/119/EC have been respected and to assess how checks of these requirements have been integrated with the requirements for control laid down in Regulation (EC) No 882/2004.*

*The system already in place ensures a basic level of surveillance of the EU requirements for animal welfare at the time of slaughter and during killing, albeit with certain gaps, notably the parameters for electrical stunning of poultry*

*Although gaps in controls have allowed animal welfare problems to go undetected or to persist without being corrected, controls are being organised into a more structured and documented system which will entail more supervision by the local CA. In relation to the enduring problem of the transport of unfit animals, the CCA's planned guidance to the sector and training of veterinarians are important measures to achieve better compliance with this issue.*

*High priority has been given to preparedness for dealing with epizootic disease outbreaks and, with the exception of two methods which would not ensure humane killing, the practicalities of carrying out the killing of animals has generally been well investigated and organised.*

*The report makes a number of recommendations addressed to the competent authorities of France, aimed at rectifying the identified shortcomings and further enhancing the control measures in place.*

## 1. INTRODUCTION

The mission took place in France from 12 to 16 February 2007. The mission team comprised three inspectors from the Food and Veterinary Office (FVO). The inspection team was accompanied during the whole mission by representatives from the Central Competent Authority, the Ministry of Agriculture, Food, Fisheries and Rural Affairs (*Ministère de l'Agriculture, de l'Alimentation, de la Pêche et des Affaires Rurales*, hereafter: CCA).

The mission was undertaken as part of the FVO's planned mission programme. An opening meeting was held on 12 February 2007 with the CCA. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission requested.

## 2. OBJECTIVES OF THE MISSION

The objectives of the mission were to evaluate the measures taken to ensure the requirements for animal welfare at the time of slaughter and killing in Council Directive 93/119/EC<sup>1, 2</sup> and how checks of these requirements had been integrated with the requirements for control laid down in Regulation (EC) No 882/2004<sup>3</sup>.

In pursuit of these objectives, the following sites were visited:

COMPETENT AUTHORITY VISITS			Comments
Competent authority	Central	2	Opening and final meetings at the CCA headquarters.
	Local	2	The offices ( <i>Départementale</i> ) of Vannes and Le Mans.
Slaughterhouses		5	One cattle slaughterhouse (concussive stunning). Two for broilers (one with electrical water bath and the other with controlled atmosphere stunning/killing). One for ducks (electrical water bath) and one which slaughtered both rabbits (electrical head only) and poultry (water bath).

## 3. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and, in particular: Article 14 of Directive 93/119/EC and Article 45 of Regulation (EC) No 882/2004.

---

<sup>1</sup> Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing, OJ L 340, 31.12.1993, p 21, (hereafter: Directive 93/119/EC).

<sup>2</sup> All legal references in this report refer, where applicable, to the latest amended version.

<sup>3</sup> Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules OJ L 165, 30.04.2004 corrected and republished in OJ L 191, 28.05.2004, p.1, (hereafter: Regulation (EC) No 882/2004)

## 4. BACKGROUND

A previous mission to France, which included animal welfare at the time of slaughter and killing, was undertaken from 24 to 28 June 2002 (report DG SANCO /8554/2002). On the aspects relevant to the current mission, this report concluded that the transport of unfit animals was tolerated by the CA and that stunning equipment was not fully compliant. In response, the CCA indicated that work had begun on a scheme to assist colleagues in evaluating fitness for transport and that the CCA would organise a meeting with representatives from the slaughter industry and scientific experts in order to draft a list of the current systems and equipment for slaughtering which comply with the legislation.

Report DG SANCO/9151/2003 principally looked at arrangements for dealing with outbreaks of Foot and Mouth Disease and Classical Swine Fever and included a description of a mobile electrocution unit for killing pigs and small ruminants. Report DG SANCO/8179/2006 focused on food safety in red meat establishments, but also indicated a lack of feeding for animals kept overnight<sup>4</sup>, inadequate restraint prior to stunning and, where electrical stunning was used, lack of displays of the electrical parameters. The reports of these missions are available under their reference numbers (hereafter: reports 8554/2002, 9151/2003 and 8179/2006) on the Directorate General for Health and Consumer Protection internet site at [http://ec.europa.eu/food/fvo/index\\_en.htm](http://ec.europa.eu/food/fvo/index_en.htm).

## 5. MAIN FINDINGS

### 5.1. Competent authority

The organisation of the Competent Authorities (hereafter: CA) in relation to animal welfare controls is described in reports DG SANCO/8554/2002 and DG SANCO/8045/2006, and a forthcoming report concerning the country profile of France on food and feed safety, animal health, animal welfare and plant health (ref. DG(SANCO)/8034/2006- MR – final) will be available under this reference on the DG Health and Consumer Protection website [http://ec.europa.eu/food/fvo/country\\_profiles\\_en.cfm](http://ec.europa.eu/food/fvo/country_profiles_en.cfm).

The following are further details of the organisation of the CA and tasks related to animal welfare at the time of slaughter and killing:

- The CA is developing a network of slaughterhouse specialists, as already exists in other sectors. This network will cover the national territory and its task will include animal welfare at slaughter. The specialists will be based at local level and will act as a link between central level and the officials in the slaughterhouses in relation to information, training and controls of animal welfare at slaughter.
- A Consultative Commission was responsible for validating methods of stunning and restraint and a list of methods approved by this Commission was last updated in June 2004. However, this Commission was disbanded in 2005 as part of a general simplification of administrative procedures throughout the civil

---

<sup>4</sup> *In their response to the draft report, the French Authorities noted that this deficiency had been corrected immediately by the operator.*

service. In the absence of this system of formal approval, it has been proposed that a working group of industry representatives will determine the categories of animals for which each method is best adapted.

Article 6 of Regulation (EC) No 882/2004 requires the CA to ensure appropriate training for staff performing official controls. In relation to animal welfare at slaughter/killing the representatives of the local CAs indicated that they discussed CCA instructions on animal welfare with their staff. However the inspection team noted that:

- These instructions were general in nature and did not provide adequate background on many of the issues which OVs encountered in carrying out animal welfare checks.
- Several OVs had insufficient knowledge of the stunning equipment used in their slaughterhouse.

The CCA is planning training before the end of 2007 for contracted private veterinarians (*vétérinaires du secteur privé sous contrat - VIV*), which will be compulsory for them to attend. The CCA has also been involved with the training of new official veterinarians so that, at the veterinary schools, they will have undergone the same training programme as contracted private veterinarians. The CCA indicated that OVs currently in post will also receive training.

## **5.2. Legislation**

A comprehensive check of national legislation was not carried out; however, during the evaluations performed for this mission it was noted that:

- Directive 93/119/EC Annex C, II (3) B (1) indicates that, the strength and duration of the current used in electric water baths for stunning poultry will be determined by the competent authority. However national legislation, *Arrêté du 12 décembre 1997, Annexe III (5) B (3)*, indicates that enough voltage shall be provided to produce a current of sufficient intensity to ensure stunning of each bird. As a result the strength and duration of the current for each species of poultry had not been established and in several cases was not effective. In one slaughterhouse, the 65V at 300 Hz applied to a waterbath containing 18 birds did not result in an effective stun and although not seen in operation, a lower current was provided in a second slaughterhouse (the OV indicated that 45 V at 300 Hz was applied to 25 birds).

Directive 93/119/EC, Article 2(5) defines stunning as any process which, when applied to an animal, causes immediate loss of consciousness which lasts until death. The CA is currently working to further define stunning within national regulations, particularly as regards its reversibility, in order to promote the integration of stunning methods into methods of religious slaughter.

## **5.3. Controls in slaughterhouses**

### *5.3.1. Approval of slaughter equipment*

Directive 93/119/EC Article 6.1 requires instruments, restraint and other equipment and installations used for stunning or killing to be designed, constructed, maintained and used in such a way as to achieve rapid and effective stunning or killing in accordance with the provisions of this Directive. Up to 2005 an important part of the CA system to achieve this included:

- The validation of the compliance of slaughter equipment.
- When the local CA were aware of methods not on this list, they had been instructed to provide information on these to the Commission responsible for their validation, who would then carry out a visit, issue an opinion and update the list as appropriate.

As this system of formal approval has been discontinued, the CCA has been proposed that a working group of industry representatives will determine the categories of animals for which each method is best adapted. In relation to the previous procedure the inspection team noted that:

- This Commission had given an opinion to one of the local CAs visited on a controlled atmosphere system for stunning/killing poultry. This method is not prescribed in Annex C of Directive 93/119/EC and in such circumstances Article 13 of Directive 93/119/EC indicates that, pending implementation of arrangements at EU level, national rules in this matter shall apply.
- The report recommended that there was a need to improve the emergency procedure for removing the birds in case of a breakdown. However, the inspection team noted that a delay of several minutes was still necessary in order that staff could perform this safely.
- The report recommended that unloading of birds should not result in birds overlying those previously unloaded onto the conveyor belt and concluded that this should be easily solved. However, the inspection team noted that this issue had not been resolved.
- Gas concentrations had been modified, as had been acknowledged as a possibility in the report. Those used at the time of this mission (1<sup>st</sup> phase 24% CO<sub>2</sub> with an alarm if this reaches 18% and 2<sup>nd</sup> phase 73% CO<sub>2</sub> with an alarm if 64% is reached) resulted in birds showing some gasping at induction, but there was a complete loss of posture by the time they entered the second stage of the process.
- Although the Consultative Commission's opinion had been given in May 2003, the method did not appear on the list of approved methods which was issued in June 2004. A representative of the CAA indicated that this must have been an oversight as there were no fundamental objections to this system.
- In the slaughterhouse for bovine animals, a concussive method of stunning was seen, which also did not feature on the list. Directive 93/119/EC Annex C, II, 2(a) requires the operator to ensure that this produces an effective stun without fracture of the skull. The CA had never verified whether or not fractures were produced and it was the inspection team who pointed out that there was an extensive depressed fracture in one out of the two skulls examined. In addition, although eye reflexes were checked before the animal was released from the restrainer, it was not possible to continue to check the state of consciousness as electro-immobilisation was applied to each animal immediately after stunning until the end of bleeding, which would have masked any signs of a return to consciousness.
- The rotation box used in this cattle slaughterhouse had been installed to facilitate the religious slaughter of cattle, but was also used when stunning cattle which were not ritually slaughtered. As it did not appear on the list of approved methods, the local CA had notified the CCA in April 2004 indicating that they

were fully satisfied with this method. Directive 93/119/EC Annex B(1) requires animals to be spared avoidable suffering or agitation at the time of restraint, whereas turning adult bovine animals through 90° in order to make it easier to place the stunning equipment is unnecessary agitation of the animals<sup>5</sup>.

- The local CA had written to the CCA in April 2004 indicating that a rotation box had been installed which was not on the list of approved methods, its function was entirely satisfactory and asked for verification by the Consultative Commission. The method did not appear on the list of methods produced by this Commission in June 2004.

### 5.3.2. *Instructions for inspection*

In relation to Directive 93/119/EC Article 8, which requires the CA to organise inspections and controls in order to ascertain compliance with this Directive, the CCA had provided an instruction to the local CAs in 1998 which gave an outline of the legal requirements, the procedures for approval of stunning methods, slaughter required by certain religious rites, imposing sanctions and emphasised the importance of training of abattoir staff.

In response to a recommendation in report 8554/2002 concerning the transport of unfit animals, the CCA indicated, at that time, that a veterinary inspector would prepare a document to assist his colleagues in evaluating fitness for transport. During the current mission it was noted that both the bovine and porcine sectors are developing guidance on the fitness of animals for transport and the CCA has been asked to verify that this guidance is in conformity with the requirements of legislation.

Article 3.1 of Regulation (EC) No 882/2004 requires controls to be carried out with appropriate frequency on a risk basis. Although there is a daily presence in all slaughterhouses, the CCA has not yet identified risks associated with animal welfare. Article 8.1 of Regulation (EC) No 882/2004 requires official controls in slaughterhouses to follow documented procedures. All veterinary controls in abattoirs are recorded on a checklist which has references to more detailed checklists on each topic. Within this framework, the CCA has produced a detailed checklist for animal welfare and accompanying *vade mecum* which are being tested out by a number of local CAs.

In Morbihan an instruction from 2005 on the role of the OV did not make any reference to animal welfare. In Sarthe instructions from 2006 outlined tasks including ante-mortem inspections, animal transport checks and the supervision of technical assistants including their awareness of animal welfare at the time of unloading.

The inspection team noted that in all slaughterhouses the general checklist had been used, but OVs had developed their own system of recording animal welfare issues and the type of information recorded varied widely and was very limited in some of the slaughterhouses visited.

---

<sup>5</sup> *In their response to the draft report, the French Authorities stated that in the case of non-ritual slaughter, the operator had been forbidden to carry out the practice of turning bovine animals through 90 degrees.*

### 5.3.3. Inspections at unloading and lairaging

In relation to ante-mortem inspections it was noted that:

- Regulation (EC) No 854/2004<sup>6</sup>, Annex I, Section I, Chapter II, (B) 1(a) requires the OV to carry out an ante-mortem inspection of all animals before slaughter; however, in one cattle slaughterhouse this was done by a technician who only notified the OV in case of doubt.
- Previously an infringement procedure had been opened against France (ref: 2000/2269) in relation to the lack of veterinary supervision, notably in carrying out ante mortem checks in slaughterhouses. This case had been closed after certain measures were taken by the CA, notably the recruitment of more staff. Report 8179/2006 indicated no major problems in relation to ante-mortem checks.

In relation to the transport of animals it was noted that:

- According to the CCA the number of emergency slaughter animals (*bovins accidentés*) has decreased from 70,000 to 14,000 cattle in the last 10 years. In 2005 around 1000 of animals in this category were killed on farm, with the remainder transported to slaughterhouses.
- Although all emergency slaughter animals had been accompanied by a certificate from a veterinarian who carries out certain tasks on behalf of the CA (*vétérinaire sanitaire*), the vast majority of cases reviewed by the inspection team were of animals suffering from conditions which would have made them unfit for transport, as defined in Article 3(b) of Council Directive 91/628/EEC and Annex I of Regulation (EC) No 1/2005<sup>7</sup>. Article 12 of Directive 93/119/EC requires that such animals are killed on the spot.
- In both local CAs OVs had instigated sanctions in certain cases against transporters, but no action had been taken regarding veterinarians who had certified this movement. The CCA agreed that training of certifying veterinarians was clearly an issue<sup>8</sup>.
- In the same slaughterhouse where ante-mortem inspections were inadequate, the presence of matted hair on a hook and shackle in a vehicle used to bring animals

---

<sup>6</sup> Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for food of animal origin OJ L 139, 30.04.2004 p. 83, as corrected OJ L 226, 25.06.2004 p.3-21, (hereafter: Regulation (EC) No 854/2004).

<sup>7</sup> Council Regulation (EC) No 1/2005 of 22 December 2004 (hereafter: Regulation (EC) No 1/2005) on the protection of animals during transport and related operations, OJ L 3, 5.1.2005, p 1, which entered into force on 5.1.2007, repealing the Council Directive 91/628/EEC (hereafter: Directive 91/628/C) of 19 November 1991 on the protection of animals during transport amending Directives 90/425/EEC and 91/496/EEC, OJ L 340, 11.12.1991, p.17.

<sup>8</sup> ***In their response to the draft report, the French Authorities acknowledged that the training of veterinarians in relation to the certification of the transport of emergency slaughter animals posed a problem. They indicated that the work currently in progress with the professional organisations will be presented to the veterinary representatives and moreover, information sessions will be organised.***

to the emergency slaughter facility indicated that certain animals had been pulled onto this vehicle. A representative of the slaughterhouse did not disagree that this may have happened<sup>9</sup>.

- Regarding poultry, the height of transport crates did not allow the birds to stand in their natural position, contrary to the requirements of Chapter IV, point 34 (b) of Directive 91/628/EEC, and Regulation (EC) No 1/2005, Annex I, Chapter II, 1(2). In relation to ducks destined for *foie gras* production, a representative of the CCA indicated that restricting their movement was necessary due to the fragile condition of the birds.

#### 5.3.4. *Inspections of restraint and stunning*

In relation to checks of restraint and stunning, the following had not been detected by the OVs:

- The absence of wetting of the shackle-to-leg contact prior to stunning poultry in all of the slaughterhouses visited, contrary to Directive 93/119/EC, Annex C, II, 3(B)3. Pre-stun shocks were also a problem in the duck slaughterhouse, although the level of water had been reduced in order to prevent this problem.
- In one slaughterhouse, rabbits which had been stunned were suspended and passed over the heads of those waiting to be stunned sometimes colliding with those below. Article 3 of Directive 93/119/EC requires animals to be spared avoidable excitement, pain or suffering.

#### 5.3.5. *Inspections of slaughter*

In relation to checks at slaughter the following deficiencies had not been detected by the OVs:

- Ducks in one slaughterhouse showed no signs of consciousness on leaving the water bath stunner and were dead at the entry to the scald tank; however, there were signs of recovery in around 10% of birds during bleeding. The OV's control points were at the exit of the stunner and at the entry to the scald tank. The ducks had been bled by incising vessels manually via the inside of the mouth; the CA explained that this had been requested by certain customers to reduce the risk of salmonella contamination arising from excising the skin of the throat. The CA had not adequately verified what vessels were incised by this method. Directive 93/119/EC Annex D (2) requires all animals which have been stunned to be bled by incising at least one of the carotid arteries.
- In a poultry slaughterhouse, birds exiting the waterbath stunner reached the neck cutter in around 12 seconds, but there were signs of recovery at the time of bleeding. Directive 93/119/EC Annex D1 requires bleeding to be started as soon as possible. The stun to stick interval for rabbits, which had been electrically

---

<sup>9</sup> *In their response to the draft report, the French Authorities indicated that immediately following this mission a check on the use of the vehicle was carried out, a warning letter was sent to the transporter and to the slaughterhouse operator, and inspections are made so that it cannot be used for live animals.*

stunned with 300V was 25 seconds<sup>10</sup>; however no signs of recovery were seen in this case.

- The slaughtermen responsible for ritual slaughter in a poultry slaughterhouse had not been authorised (*habilité*) as required in the national legislation (*Article R 214-75 Code Rural*). Directive 93/119/EC Article 2(8) requires the religious authority to operate under the responsibility of the OV and in the CCA's instruction of 1998 OVs had been informed that their responsibilities included verification of the approval of slaughtermen for ritual slaughter. An instruction from the CCA in 1995 had also asked the local CAs to verify that persons carrying out ritual slaughter had been authorised, which meant that a slaughterman must present a document of authorisation to the OV, and a note in 2004 sent to a local CA, not visited on this mission, reminded them of the significance of this procedure<sup>11</sup>.

#### 5.3.6. *Verification of inspections*

Article 8.3(a) of Regulation (EC) No 882/2004 requires the CA to have procedures in place to verify the effectiveness of official controls.

In Sarthe an annual visit by the local CA to each slaughterhouse had focused on public health aspects and according to the representatives met, animal welfare issues had been discussed. A representative of the local CA indicated that the format for this annual supervisory visit is being formalised and structured as part of their move towards quality assurance accreditation in 2008, so that in future animal welfare will be systematically included.

In Morbihan the local CA had carried out supervision of the work of the OV in relation to hygiene requirements but not animal welfare. The local CA indicated that experts, who will be able to evaluate this work, will be nominated by the end of the first semester of 2007.

A representative of the CCA indicated that for the last ten years BSE controls had been the main focus in relation to checks in slaughterhouses and this had required an enormous involvement from OVs and local CAs, but now that non compliance in this area and its severity were declining other areas would receive a greater priority.

#### **5.4. Killing for disease control purposes**

The CCA's guidance tables on methods of killing provided concise information on the advantages/ disadvantages of each method.

In relation to the porcine sector, it was noted that:

---

<sup>10</sup> *In their response to the draft report, the French Authorities indicated that to facilitate the timing of the mission team's visit the line speed had been reduced so that slaughter was taking place during the visit. The normal time between stunning and bleeding is around 13 seconds.*

<sup>11</sup> *In their response to the draft report, the French Authorities indicated that immediately following this mission the slaughtermen concerned had been requested to provide their authorisation documents.*

- In Sarthe two people were authorised to use electric tongs for killing pigs on farm and, on the basis of the data provided, this method would be limited to dealing with 300 pigs in 10 hours.
- Ten times this number of pigs can be processed in each of the two trailers, which are kept in Brittany but can be used wherever they are needed for electrocuting pigs. On the basis of a video provided of the machine not in operation, the inspection team concluded that the electrified chains would not meet the requirements of Directive 93/119/EC, Annex C, II(3)A(1) as the electrodes would not always span the brain. A report on the use of this machine during a field exercise several years earlier was requested by the inspection team; however, this report was not provided by the CCA.

In relation to the bovine sector, it was noted that:

- Use of an injectable killing agent was the preferred method. Although each local CA has only enough in stock for 100 animals, both the CCA and local CA indicated that there was no problem getting more of this drug, as it is widely available and there is also stocks stored in laboratories<sup>12</sup>.

In relation to the poultry sector, it was noted that:

- Following arrangements made at national level, each local CA has the option of involving a private company to carry out the killing of poultry and in Sarthe, an exercise carried out in May 2006 found that this company were able to deploy within 40 hours, as indicated in their contract.
- In Morbihan the local CA had direct access to a container for gassing poultry and there are eight such containers distributed throughout France. Although this equipment is the property of the state, a private company is responsible for its transport and its operation in relation to the provision of gas. The local CA had used this method for killing Salmonella infected flocks.
- The local CA in Morbihan also had some experience with whole house gassing and indicated that the introduction of CO<sub>2</sub> into a building is noisy and may provoke panic among the birds. In addition, it is difficult to avoid the gas, which is at freezing temperatures when introduced, coming into direct contact with certain birds. The CCA indicated that this method was limited for use in buildings where the birds were kept at a height of less than 1.5m from the floor.
- Directive 93/119/EC Annex C, III(3) requires the CA to lay down the concentration and length of exposure to CO<sub>2</sub>. Although the CCA provided data on the concentration of gas for each of the methods, the length of exposure had not been laid down.

Several aspects of the CCA guidance had been adapted by the local CAs, including:

---

<sup>12</sup> *In their response to the draft report, the French Authorities indicated that there is a national stock of 1000 bottles of the drug for euthanasia and can be provided to any Département which needs them in an emergency. In addition each Département can call another one to obtain stocks in case of necessity.*

- The use of alphachloralose in feed followed by asphyxiation of the birds in bags is a method listed in the national contingency plans; however, the local CA in Sarthe had added a further remark that birds should not be put in a bag if they remained alert.
- In Morbihan, the local CA indicated that it was difficult to get a uniform effect with this method due to the variation in feed intake particularly if birds were clinically ill. Although the local CA indicated that the use of alphachloralose would still be considered, it was not a method of choice.

In relation to contingency plans, a representative of the CCA indicated that audits, as required by Article 4(6) of Regulation No 882/2004, will be carried out in the next three years by staff who are independent from the CCA and local CA dealing with this issue.

## 6. CONCLUSIONS

- 1) OV's had insufficient knowledge for controlling certain aspects of the requirements for animal welfare at slaughter, as training has not been sufficient, contrary to Article 6 of Regulation (EC) No 882/2004.
- 2) The CA has not determined the strength and duration of the current for electrical waterbath stunning of poultry, contrary to Annex C, II (3) B (1) of Directive 93/119/EC, as French legislation differs from the requirements of Directive 93/119/EC on this issue. As a result, there were variations in the effectiveness of stunning.
- 3) There is a gap in controls to ensure that Article 6 of Directive 93/119/EC is respected, as OV's had come to rely on the system of approval of methods of restraint and stunning, although this had ceased operating over two years ago. The expert group which is being established by the CCA is a useful measure to support OV's on this issue.
- 4) The basic outline of tasks provided to OV's by the CCA and local CA does not provide an adequate framework for inspections, contrary to Article 8 of Directive 93/119/EC, as important points of control were overlooked and certain animal welfare problems were not detected. Documented procedures are being developed to meet the requirements of Article 8(1) of Regulation (EC) No. 822/2004, and the involvement of a network of local CA experts in this is a good initiative not only to ensure that more thorough checks are made as required, but that these are as practical as possible. The CA has not yet identified risks for animal welfare at slaughter, contrary to the requirements of Article 3(1)(2)(3) of Regulation (EC) No 882/2004, which gives additional criteria on how checks should be organised.
- 5) Checks were not always adequately recorded and the system for reporting the outcome of inspections is still under development to meet the requirements of Article 9 of Regulation (EC) No 882/2004. Although the lack of adequate ante-mortem inspections in one cattle slaughterhouse may be an isolated case, this is contrary to Regulation (EC) No 854/2004 Annex I Section I Chapter II, (B) 1(a) and is particularly significant, given that the CCA had to take actions in the recent past to address a more general non-compliance with this requirement.

- 6) For issues where CA instructions had already been given, or even repeatedly given, such as for the approval of persons carrying out ritual slaughter, measures to verify the effectiveness of inspections had not been sufficient, contrary to Regulation (EC) No 882/2004 Article 8 (3). Steps are being taken so that animal welfare will be more systematically included in supervisory visits by 2008.
- 7) Enforcement actions have not been sufficient to discourage the transport of seriously injured animals, contrary to Article 3(b) 6(3) and 8(1) of Regulation (EC) No 1/2005 and Article 12 of Directive 93/119/EC. Although the more detailed guidance for OV's promised by the CCA following report 8554/2002 was not provided, further measures are underway to address this issue, notably guidance to the sector and training for certifying veterinarians. These are necessary steps towards progressive enforcement, as required by Regulation (EC) No 854/2004 Article 9 and Annex I, section II, Chapter IV.
- 8) As a result of the preparations made by all levels of the CA, those responsible for organising the killing of animals in disease outbreaks are well informed and adequately equipped for dealing with such situations. However, the use of alphachlorolose followed by asphyxiation in bags, although not the first method of choice of the local CAs, is contrary to the general provisions of Article 3 of Directive 93/119/EC which requires animals to be spared avoidable excitement, pain or suffering at the time of killing.
- 9) Regarding methods of killing on farms where CO<sub>2</sub> is used, the length of exposure has not been defined by the CA<sup>13</sup> and regarding the machine for electrocuting pigs, the electrodes will not always span the brain, both of which are contrary to Directive 93/119/EC Annex C III, 3.

### **6.1. Overall conclusion**

The system already in place ensures a basic level of surveillance of the EU requirements for animal welfare at the time of slaughter and during killing, albeit with certain gaps, notably the parameters for electrical stunning of poultry.

Although gaps in controls have allowed animal welfare problems to go undetected or to persist without being corrected, controls are being organised into a more structured and documented system which will entail more supervision by the local CA. In relation to the enduring problem of the transport of unfit animals, the CCA's planned guidance to the sector and training of veterinarians are important measures to achieve better compliance with this issue.

High priority has been given to preparedness for dealing with epizootic disease outbreaks and, with the exception of two methods which would not ensure humane killing, the practicalities of carrying out the killing of animals has generally been well investigated and organised.

---

<sup>13</sup> *In their response to the draft report, the French Authorities indicated that in relation to gassing in containers the time of exposure depends on the time to collect the birds and fill the container. As an indication, it should last around one minute per bird. Concerning whole house gassing, the diffusion of gas lasts around 20 minutes and in practice it is necessary to wait three hours before the concentration falls to 0.5- 1 % and the collection team can, after agreement from the fire service, enter the building.*

## **7. CLOSING MEETING**

A closing meeting was held on with representatives of the Central Competent Authority. At this meeting, the main findings and conclusions of the mission were presented by the inspection team. In their reaction to these findings the CA indicated that they had mixed feelings as although some good practice had been identified, some bad points related to issues which they have been addressing for some time. In relation to the transport of unfit animals they indicated that the Public Health section of the CCA is also working on this issue in relation to the recent EU hygiene requirements and that this combined effort should make it possible to solve this problem.

## **8. RECOMMENDATIONS**

Within 25 working days of receipt of the translated report, the Competent Authorities are requested to present a plan of actions, including a timetable for their completion, to address the following recommendations. The CCA should take measures to ensure that:

- 1) Training on animal welfare at the time of slaughter provides an adequate level of knowledge of requirements to the staff carrying out official controls, as required by Article 6 of Regulation (EC) No 882/2004.
- 2) The strength and duration of the current in electric waterbath stunners for poultry is determined by the competent authority, as required by Directive 93/119/EC Annex C, II (3) B (1).
- 3) Equipment used for restraint and stunning complies with Artt. 3 and 6 of Directive 93/119/EC.
- 4) Documented procedures are provided for all controls implementing Directive 93/119/EC, as required by Article 8(1) of Regulation (EC) No 882/2004.
- 5) The risks associated with animal welfare at the time of slaughter are identified and inspections are organised to meet the requirements of Article 3(1)(2)(3) of Regulation (EC) No 882/2004.
- 6) The results of inspections are reported as required by Article 9 of Regulation (EC) No 882/2004.
- 7) Ante-mortem inspection of all animals before slaughter is carried out by an Official Veterinarian, as required by Regulation (EC) No 854/2004 Annex I, Section I, Chapter II, (B) 1(a).
- 8) The effectiveness of inspections is verified, as required by Regulation (EC) No 882/2004 Article 8 (3).
- 9) Regarding the transport of unfit animals, proportionate and progressive enforcement is taken, as required by Regulation 854/2004 Art. 9 and Annex I section II, Chapter IV.
- 10) In killing during disease outbreaks, methods used are compatible with the requirements of Article 3 of Directive 93/119/EC; the electrocution of pigs is

performed so that the electrodes span the brain and where CO<sub>2</sub> is used, the length of exposure is defined, both of which are required by Directive 93/119/EC Annex C, III 3.

## **9. COMPETENT AUTHORITY RESPONSE TO THE RECOMMENDATIONS**

Once the report has been published, the competent authority response to the recommendations can be found at the following link:

[http://ec.europa.eu/food/fvo/ap/ap\\_france\\_7330\\_2007.pdf](http://ec.europa.eu/food/fvo/ap/ap_france_7330_2007.pdf)