EFBA’s response to the Commission’s consultation on the protection of animals at the time of slaughter or killing

Fur farmed animals: a specific case

31 January 2008

The European Fur Breeders’ Association (EFBA) is strongly committed to maintaining the highest standards of welfare for fur farmed animals throughout their whole life cycle.

As such EFBA welcomes the European Commission’s initiative to review the Directive 93/119 on the protection of animals at the time of slaughter or killing, and believes in strengthening welfare standards for the stunning and killing of farmed animals.

In order to guarantee a scientifically approved killing method, EFBA recommends:

- **Adapted killing methods for each species as a guarantee of high welfare standards**
  There is no universal method for killing farmed animals and it is therefore necessary to adapt the process to each individual species, to guarantee high welfare standards for all animals.

  In order to avoid unnecessary fear, anxiety, pain, suffering or distress to the animals, it has been scientifically proven that individual fur-farmed species should be killed using specific methods.

- **Competent and trained operators**
  EFBA believes that improved animal welfare can only be achieved if the person responsible for the management of a fur farm (i.e. the operator) bears full responsibility for animal welfare.

  As proposed by the EU Commission this should be achieved through the following methods:
  - pragmatic Standard Operation Procedures (SOP),
  - monitoring of the killing process,
  - introduction of a specific certificate of competence for killing of animals for the responsible farmer.

- **Use of adequate equipment**
  The equipment (stunning/killing boxes and electrocution devices) used on farms today to kill the fur animals, does not have devices permitting an adequate monitoring of gas concentration and amperage/voltage. Such monitors are to be developed and implemented on the farms, making a transitional period necessary.

Finally, although permitted under current EU legislation, the use of drugs -chloroform and barbiturates- is not recommended by EFBA for killing fur farmed animals.
European fur farming industry: a sector respecting animal welfare

Representing a respectful industry, EFBA created almost 10 years ago a Code of Practice for the care and health of fur farmed animals in Europe. Adopted by EFBA’s members, this Code of Practice covers all fur farming activities, including killing methods, demonstrating a strong commitment to animal welfare. Over the years, the farmers have developed a positive attitude towards the welfare of their animals.

Fur is a delicate product and its final quality is highly dependent on the way animals are killed. Avoiding them to be stressed at this time is a key priority. This is why the fur farming industry has put in place high animal welfare standards during the killing process.

EFBA is also strongly committed to carrying out all killing on the farm (no transportation of animal required) whilst ensuring that there is no distress caused to the other animals on the farm. Pelting also takes place sufficiently far away that it is not a disturbance to the other animals.

A killing method adapted to each fur farmed species

There are no ‘ideal’ methods appropriate for the killing of fur farmed animals. In line with EFSA\(^1\) guidelines, EFBA considers that it is necessary to select those methods whose application guarantees the maximum level of animal welfare during the killing process.

EFBA has then evaluated the methods outlined in Directive 93/119/EC, prevailing scientific evidence on animal welfare impact and experience with current killing procedures. This evaluation of recommended methods takes into account animal welfare rules for painless killing as well as the conditions of farm practice\(^2\). The procedure must be:

1) as brief as possible,
2) cause a minimum of excitation and pain,
3) without danger to the operator,
4) easily applicable.

Gas and electrical killing methods are both seen as highly effective for most species. However both are very demanding in terms of the technical equipment needed and require skilled operators and effective process monitoring.

Due to the differences in the morphology of individual fur farmed species, specific methods have been adopted to maximise animal welfare:

- Mink and Fitch: exposure to gas
- Fox and Finnraccoon: electrocution
- Chinchilla: electrocution or fracture of the neck

EFBA recommends that the above methods should also be used when an animal is killed due to sickness or injury. For sick or injured mink, the stunning followed by a fracture of the neck could be an alternative.

\(^1\) EFSA, Journal on Welfare aspects of the main systems of stunning and killing the main commercial species of animals, 2004
\(^2\) Hans-Christoph Löfliger, Euthanasia for fur-bearing animals for pelting, Scientifur, 1984
Gas exposure: the less painful method for mink and fitch species

In line with the scientific assessments below, EFBA recommends gas methods, exposure to carbon dioxide (CO₂) or carbon monoxide (CO), for killing mink and fitch species.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>CO₂</th>
<th>CO</th>
<th>Scientific Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brief procedure</td>
<td>Brief (in seconds)</td>
<td>Brief (in seconds)</td>
<td>N.E. Hansen³</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>E. Lambooy⁴</td>
</tr>
<tr>
<td>Minimum pain and excitation</td>
<td>Convulsions observed to a varying degree in all animals in the coma phase till cessation of respiration</td>
<td>Convulsions observed in some animals in the coma phase till cessation of respiration</td>
<td>N.E. Hansen E. Lambooy FVE⁵</td>
</tr>
<tr>
<td>No danger to the operator</td>
<td>No Risk</td>
<td>May represent some hazard if operator not well informed</td>
<td>FVE G.G. Finley⁶</td>
</tr>
<tr>
<td>Practicality</td>
<td>Simple procedure</td>
<td>Simple procedure</td>
<td>N.E. Hansen E. Lambooy</td>
</tr>
</tbody>
</table>

EFBA does not recommend the electrocution for killing boxes as it causes paralysis followed by suffocation but not immediate unconsciousness (G.G. Finley).

In order to mitigate some of the weaknesses/risks attached to each method, EFBA recommends the following procedures and parameters for killing mink and fitch species with CO₂ or CO. Their implementation will ensure high standards of animal welfare and high levels of protection for operators:

- The time interval from the admission of gas to the box to the transfer of the first animal to the stunning/killing box must be set and respected.
- The time interval from transfer of last animal to the stunning/killing box to the opening and emptying of the box must be set and respected.
- When using CO, the farmer must ensure that the process is secured and safe, leaving the stunning/killing box open for two minutes before emptying it.
- Concentration of gas in the stunning/killing box must be monitored to ensure a close to 100% concentration when using CO₂ and a minimum of 4% concentration when using bottle

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³ N.Enggaard Hansen, Euthanasia of mink (mustela vision) by means of carbon dioxide (CO₂), carbon monoxide (CO) and nitrogen (N₂), Scientifur, 1989  
⁴ E.Lambooy, Euthanasia of mink with carbon monoxide, Scientifur, 1985  
⁵ Federation of Veterinarians of Europe (FVE/06/doc/033 final 25/10/2007)  
⁶ G.G.Finley, Humane euthanasia (killing) of peltier mink, Canadian Veterinary Journal, 1978
administered CO. When using engine-induced CO the concentration only needs to be 1% as the engine exhaust also consists of CO₂, N₂ and NOₓ gasses. Automatic closing device on the hatch through which the animals enter the stunning/killing box.

- Inspection facility (transparent glass) should be made available on the stunning/killing box. This inspection glass should be covered during the process in order to secure darkness and because this keeps the animals calm.
- Farmers should write up an individual, daily control report detailing their adherence to the stunning/killing procedures.
- The control of heart beats and the cessation of respiration should be checked for each animal to ensure they are effectively dead.

A thorough introduction to the above procedures must form part of the education required for farmers to be awarded their species-specific certificate of competence for stunning/killing of animals.

**Electrocution: the most suitable method for foxes and finnraccoons**

In line with the scientific assessments below, EFBA recommends the use of electrocution to kill foxes and finnraccoons.

<table>
<thead>
<tr>
<th>Fox/Finnraccoon</th>
<th>Criteria</th>
<th>Electrocution</th>
<th>Scientific Reference</th>
</tr>
</thead>
</table>
|                 | Brief procedure | Brief (in seconds) | H.T.Korhonen⁷  
E. Lambooy⁸ |
|                 | Minimum pain and excitation | Respiratory arrest and heart fibrilation after stunning observed for all animals | H.T. Korhonen  
E. Lambooy  
FVE |
|                 | No danger to the operator | Simple electrical stunning devices | E. Lambooy |
|                 | Practicality | Simple procedure | E. Lambooy |

**EFBA recommends the following steps for a strengthening of the procedures and the parameters used in order to ensure fast respiratory arrest and heart fibrillation:**

- Electrocution must be carried out by placing one electrode in the rectum and another in the mouth.
- Appliance of electrical current should last a minimum of 3 seconds (FVE, E. Lambooy).

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⁷ Hannu T. Korhonen, Electrocution in farmed foxes: evaluation from an animal welfare point of view, 2007  
⁸ E. Lambooy, Electrocution of foxes, Scientifur, 1983
• A minimum of 110 Volts and 0.3 Ampere should be applied (FVE, E. Lambooy).
• The voltage and amperage should be monitored and electrical stunners should be equipped accordingly.
• Farmers should write up an individual, daily control report detailing their adherence to the stunning/killing procedures.
• The control of heart beats and the cessation of respiration should be checked for each animal to ensure they are effectively dead.

A thorough introduction to above procedures must form part of the education required for farmers to be awarded their species-specific certificate of competence for stunning/killing of animals.

### Electrocution/Fracture of the neck: the most appropriate methods for chinchillas

The principal method used to kill chinchilla species is the electrical stun (for large numbers) or the fracture of the neck (for small numbers).

Both methods have been judged to be acceptable from an animal welfare point of view (SCAHAW 2001).

**EFBA recommends the following steps for a strengthening of the procedures and the parameters used for killing chinchillas through electrocution:**

• Electrocutio carried out by fixing electrodes to one ear and the tail.
• Appliance of electrical current should last a minimum of 60 seconds.
• A minimum of 0.57 Ampere should be applied.
• The amperage should be monitored and electrical stunners should be equipped accordingly.
• Farmers should write up an individual, daily control report detailing their adherence to the stunning/killing procedures.
• The control of heart beats and the cessation of respiration should be checked for each animal to ensure they are effectively dead.

**EFBA proposed procedures and parameters for killing chinchillas through neck fracture:**

• The method is borrowed from SCAHAW 2001: ‘the animal is held by its tail with the head down and facing away from you. You then place 2 fingers on the forehead and the thumb underneath the chin. You hold the chinchilla firm this way, then you press your hand downwards while you press your thumb upwards until you feel a crack and the animal is dead’
• Farmers should write up an individual, daily control report detailing their adherence to the stunning/killing procedures.
• The control of heart beats and the cessation of respiration should be checked for each animal to ensure they are effectively dead.

A thorough introduction to above procedures must form part of the education required for farmers to be awarded their species-specific certificate of competence for stunning/killing of animals.

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9 SCAHAW, Killing of animals kept for fur production, 2001
Brief presentation of EFBA

The European Fur Breeders’ Association (EFBA) represents the umbrella organisation of 16 national fur breeders associations in Europe: Belgium, Denmark, Germany, Greece, Finland, France, Iceland, Ireland, Italy, Latvia, Lithuania, Netherlands, Norway, Poland, Spain and Sweden.

EFBA works to promote a realistic public image of the European fur farming sector, based on a policy of openness and transparency. We seek to promote awareness and understanding of the latest developments in fur animal welfare, environmental issues and modern farm management.

The organisation strives to standardise European fur farming practices and legislation based upon high welfare standards, scientific evidence and fur farming’s socio-economic sustainability. Fur farmed species cover minks (*mustelidae family*), fitches (*mustela puterious family*) foxes (*canidae family*), finn raccoons (*nyctereutes procyonoides family*), and chinchillas (*chinchilla laniger family*).

Animal welfare has always been a key priority for EFBA. As a responsible European Association, EFBA introduced in 1999 a Code of Practice for all its members, based on the ‘Council of Europe Recommendation on the protection of fur farmed animals’.

**Fur farming - a key industry for the EU with a wide geographical impact:**

- Fur farming is concentrated in Denmark, Finland and Netherlands
- Denmark is the largest producer of mink skins in Europe
- Finland is the largest producer of fox pelts in Europe
- Copenhagen and Helsinki are among the world’s largest fur auction houses
- Main centres for fur dressing and dyeing are in France, Italy & Greece
- Fur is 3rd largest agricultural export from Denmark
- Fur is a key industry for new Member States Poland, Latvia, Lithuania and Estonia (2.2m mink skins produced in Poland in 2006)
- EU Region worldwide leader in mink species production

**Some key figures on the European fur industry (2006):**

- 6,000 fur farms in EU Member States
- Value of EU farmed fur 1.5bn euro
- Europe accounts for 53% of worldwide mink fur production
- Europe accounts for 34% of worldwide fox fur production
- EU farmed fur production: 25.1m mink pelts and 2.6m fox pelts
- Estimated employees in fur sector (the whole supply chain): 164,000 full time and 174,000 part time employees

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