Introduction

Eurogroup believes from what it has witnessed and from what it knows about new scientific developments that there is an urgent need to update and strengthen the existing legislation, and thus welcomes that the European Commission will be reviewing directive 93/119 on the protection of animals at the time of slaughter or killing.

This document lays out a summary of Eurogroup for Animals’ position on improving the welfare of farmed animals during the processes of slaughter and killing, including related operations.

General Requirements

Eurogroup believes that the following requirements must be included in the revised Directive:

1. All farmed animals must be spared any avoidable excitement, pain or suffering during movement, lairaging, restraint, stunning, slaughter or killing.

2. All animals must be stunned before slaughter.
   As long as slaughter without pre-stunning takes place, Eurogroup believes than an official veterinarian must be present at all times at the sticking point to assess slaughter conditions.

3. All people involved in unloading, lairaging, handling, restraining, hoisting, shackling, stunning, slaughter, killing and assessment must have received appropriate training, commensurate with their activity, before they start working with animals.
   Recognition of their skills and knowledge must be assessed by an official veterinarian, who will grant them a licence (Certificate of Competence) after passing a practical and theoretical examination.

4. The slaughterhouse operator shall appoint a staff member as an animal welfare officer (AWO), who will be responsible for the supervision of animal welfare and shall be available at all times when there are live animals on the premises.
   The AWO must hold an authorisation issued by a competent authority, granted after successfully completing a recognised welfare training course and a written examination.

5. When approving a slaughterhouse under the regulation (EC) 853/2004, the Competent Central Authority (CCA) must ensure that welfare considerations are taken into account as well as the hygiene ones, and, especially that, structure, equipments, facilities, competence of staff or procedures do not compromise the welfare of animals.

6. New technologies, equipments or procedures to restrain, stun, slaughter or kill are continuously being developed. Before being used, they must be tested to ensure they conform to animal welfare standards, and they must also be approved by the competent authority.

7. With regard to the definition of stunning, the new legislation must specify that the induction of unconsciousness shall be not aversive.

8. All farmed animals, including fish, shall be covered by these general provisions.
9. In case of emergency slaughter:
   - When it is for human consumption, the slaughter conditions must comply with the same requirements as in an abattoir.
   - When it is for disease controls, the CCAs must have in place contingency plans where full consideration is paid to the protection of animal welfare.
   - The use of ventilation shutdown and vacuum chambers must be prohibited.

10. In case of slaughter outwith a slaughterhouse, an animal must be slaughtered only by a licensed slaughterman, holding a certificate of competence delivered by an official veterinarian.

Specific Requirements

**RED MEAT**

Animals covered in this chapter are: cattle, sheep, goats, pigs, horses and farmed deer.

1. Unloading must take place only under supervision of the AWO or another adequately trained operative.
2. Lairaged animals must have access to drinking water from appropriate facilities at all times.
3. The space allowance in the pens must be such that each lairaged animal is able to lie down, stand up, and turn without difficulty.
4. Any animal which has experienced pain or suffering during transport or following its arrival at the slaughterhouse must be slaughtered or killed immediately.
5. Any animal which is too young to take solid food must be slaughtered or killed immediately.
6. Animals kept in the lairage must be inspected at least every morning and evening (including weekends) by the AWO or another competent person working under his or her responsibility.
7. The official veterinarian must be informed immediately of any welfare issues.
8. Lactating animals should be slaughtered or killed immediately. If immediate slaughter is not possible, animals must be milked twice a day.
9. No animal should be stunned without having been adequately restrained. The operator must have access to back-up stunning equipment.
10. Any apparatus used for stunning or killing must be adequately maintained, with documented records.
11. Given the risk of recovery linked with a possibly delayed sticking, the current ban on pithing should be lifted.
12. Mixtures of gas containing 90% CO$_2$ in air to stun or stun/kill pigs must not be used, as they are too aversive, and must be phased out in five years. As long as mixtures containing 90% CO$_2$ in air are still used, the new legislation must make clear that the CO$_2$ must kill the pigs, not only stun them.
13. The use of paternoster systems must be phased out within five years.
14. Electric stunners must be fitted with a recording system of electrical parameters.
15. Interval stun-stick must be as short as possible. It should be sufficiently short to induce death through blood loss before the animal recovers from the stun.
16. In sheep, both carotids must be severed.
17. No dressing procedure or any electrical stimulation must be performed on the animal before the bleeding has ended, and in any event not before the expiry of a period of at least 30 seconds for bovine and equine animals, and at least 20 seconds for other species after sticking.
POULTRY

Slaughter in an abattoir

1. Given the serious welfare concerns expressed by EFSA with regards to this practice, shackle lines, and, as a consequence, electrical waterbaths, must be phased out within five years. New techniques, such as gas killing which is already used in some countries (e.g., UK for turkeys, DK for spent hens) must be researched and developed. Pending implementation of a ban, every effort must be made to minimise stress and suffering of birds as specified below:

- Suspension from the shackles must be limited to one minute, as recommended by EFSA.
- The whole length of the shackle line up to the point of entry in the scald tank must be immediately accessible to any person, should an emergency situation arise.
- The use of high frequencies (> 50 Hz) must be prohibited, pending further research showing voltage and current to be applied to achieve a consistent stunning.
- Constant current stunners must be used. The use of constant voltage stunners and direct current must be prohibited, as those methods are achieving an inconsistent stunning.

2. When using gas, the mixture must kill the birds and not only stun them. The mixture used should be argon or nitrogen, with a maximum of 2% of residual oxygen. If CO2 is used, the maximum concentration should be 30%.

3. The use of vacuum chambers must be prohibited

4. Bleeding must be achieved by severing of both carotid arteries.

5. No dressing procedure must be performed on the animal before the bleeding has ended and in any event not before the expiry of a period of at least two minutes for turkeys or geese, or 90 seconds for any other bird after sticking.

Surplus chicks

1. Production systems must be developed which do not involve the destruction of surplus males.

2. Research and development is required to refine techniques of gender manipulation and the sexing of eggs.

Until such systems are developed, Eurogroup is concerned that most of currently used methods compromise the welfare of chicks.

RABBITS

1. Rabbits must be handled only by the scruff, with one hand supporting the pelvis.

2. Killing and stunning may be performed by penetrative captive bolt, electrical stun/bleeding, head blow/neck blow/bleeding, gas stunning/killing.

3. Further research is required to develop gas stunning/killing techniques.

PREGNANT ANIMALS

1. If the uterus is intact, the foetus must be left inside until it is dead.

2. In doubt, or if a conscious foetus is discovered in the womb of an animal after slaughter, it must be promptly removed, stunned with a penetrative captive bolt and killed by exsanguination.
ANIMALS KEPT FOR FUR

Eurogroup is opposed to the farming of animals for fur, given the serious welfare problems associated with this activity.

As long as animals are killed for fur however, the industry must address the difficulties of doing so humanely, despite the inherent welfare problems involved in handling and killing such animals.

1. Only appropriately trained staff, holding a certificate of competence delivered by an official veterinarian (OV), should carry out slaughtering procedures.
2. There must be a regular supervision of the slaughter process by an OV.
3. To kill mink, the use of carbon dioxide or carbon monoxide produced by an engine must be prohibited. Batch killing of mink must be prohibited.
4. To kill foxes, the use of electrocution, involving insertion of electrodes into the animal’s orifices, must be prohibited. Foxes should be killed by using stun guns or lethal injections, administered by a veterinarian.

FISH and CRUSTACEANS

1. Stunning/killing of farmed fish by the following methods are not acceptable and should be banned: asphyxia, exsanguination without stunning, thermal shock, salt/ammonia and carbon dioxide.
2. Research about appropriate methods to stun/kill farmed fish must be developed.
3. Selling fish alive must be prohibited.
4. In the absence of further research indicating otherwise, crustaceans must only be killed by methods which use electrical stunning/killing equipment.