



Animal welfare at the time of killing and slaughter

Position Paper
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Summary

With almost 10 billion farmed animals slaughtered every year in the European Union, and the increased number of culling operations due to disease control, welfare at the time of slaughter and killing is a major concern. In May 2020 the European Commission announced the revision of the Slaughter Regulation to address major shortcomings. Eurogroup for Animals advocates to: align the legislative text with the latest scientific knowledge by, also, broadening its scope particularly to fish; address the major shortcomings and potential threats of the present rules; and enhance animal welfare by regulating mobile slaughter and favour on-farm killing of end-of-production animals.

Background

Every year, at least 8.4 billion cattle, sheep, horses, rabbits, pigs, poultry, and goats as well as [around 1.5 billion farmed fish](#) are slaughtered in the European Union.¹ The welfare of animals at the time of slaughter and killing is regulated by Council Regulation (EC) No 1099/2009 (Slaughter Regulation).

This legislation replaced Council Directive 93/119/EC, and it came into effect in January 2013. It lays down rules for the killing of animals bred or kept for the production of food, wool, skin, fur or other products, and partially to fish.² Additionally, it applies to the killing of animals for the purpose of depopulation and for related operations. Animals being killed or slaughtered in other contexts do not fall under the scope of this legislation (e.g. animals used in scientific experiments carried out under the supervision of competent authorities; animals killed in the context of hunting, recreational fishing activities, and cultural or sporting events; and poultry, rabbits, and hares slaughtered outside of a slaughterhouse by their owners for private domestic consumption).

Currently, an assessment of the level of the Regulation's implementation remains challenging as the data available at European level is not extensive and reliable enough to convey meaningful information about levels of compliance across the Union (CoA, 2018). The lack of official audits on animal welfare at slaughter from 2015 to 2021 adds up to the lack of data.

¹ Based on FAO data from 2019. These numbers concern terrestrial farmed animals that are killed in approved slaughterhouses. Therefore, this data does not include the terrestrial farm animals killed for control disease operations as well as emergency killing, and the terrestrial farm animals slaughtered on farms for private consumption. Also, quails are not included in this data (CIWF estimates that every year at least 100,000,000 quails are slaughtered).

² Only the general requirements laid down in Article 3.1 apply to fish.

Some of requirements introduced by the Regulation ensure better protection of animals at the time of killing³; however certain provisions pose problems from an animal welfare perspective. Over the years, Non-Governmental Organisations (NGOs) and scientists have raised concerns over the use of some stunning methods as well as the derogation to mandatory stunning foreseen for those killing operations carried out in the context of religious rites. This possibility was set by the European law, despite the fact, three years before the publication of the current Slaughter Regulation, the European Food Safety Authority (EFSA) concluded that "*due to the serious animal welfare concerns associated with slaughter without stunning, pre-cut stunning should always be performed*" (EFSA, 2004). Throughout the years, this recommendation has been reiterated by the EFSA (EFSA, 2020b) and supported by the Federation of Veterinarians of Europe (FVE), the British Veterinary Association (BVA), and the Humane Slaughter Association (HSA).

While acknowledging the negative welfare consequences linked to slaughter without prior-stunning, animal pain and suffering are associated with stunning methods permitted by EU law, because of the ineffectiveness of such methods or their adverse effects on animals. For instance, the EFSA concluded that electrical water-bath stunning does not ensure that all birds are stunned, and recommended to urgently develop electrical methods that can guarantee 100% stun efficacy (EFSA, 2012; 2019). Currently, about 80% of laying hens and broiler chickens in the EU are stunned with this method (COM(2013) 915 final), which is linked to pain and bone fractures caused by the inversion and shackling of live birds (EFSA, 2004). Serious welfare concerns are associated with the use of high concentrations of CO₂ for stunning pigs, which has been shown to cause pain, fear and respiratory distress (EFSA, 2020a).

The human factor plays a key role in ensuring animal welfare at slaughter: operators' lack of skills was recognised at the source of many hazards by the EFSA (2019; 2020a; 2020b). The slaughtering and meat processing industry is characterised by de-skilling and hard working conditions of migrants and posted workers on temporary contracts (Eurofound, 2018). During the COVID-19 pandemic, the high rates of infection inside the European abattoirs has further exposed the difficult working conditions inside the plants, also affecting the animal welfare officer (Reg. 1099/2009, Art. 17) who works under pressure with limited time to properly fulfil their duties.

Throughout the years, undercover investigations revealed the abuses on animals generated from these difficult circumstances. With the aim to better monitor and improve enforcement, some Member States (France, Spain, and Italy) allowed for closed-circuit television (CCTV) cameras inside the abattoirs. In order to overcome barriers linked to the availability and accessibility of the recordings, the Netherlands started to introduce [Video Content Analysis](#) to identify critical situations. Such a system allows for both an immediate reaction of the Animal Welfare officer as well as for a targeted post-evaluation.

Other than being killed in a slaughterhouse, animals can be killed on-farm (i.e. emergency killing and depopulation operations). Member States send to the European Commission yearly reports on the disease control operations carried out (Reg. 1099/2009, Art. 18.4). However, the confidentiality of these reports, the lack of an Union-harmonised template and a platform for discussion and exchange best practices make it difficult to

³ Specifically, this Regulation prescribes: mandatory certificate of competence for people handling the animals; mandatory presence of an Animal Welfare officer inside each slaughterhouse; and a list of approved stunning and killing methods.

identify systematic problems and implement effective solutions. With the increasing culling operations being carried out due to zoonoses, such as Avian Influenza, and emerging viruses, it is urgent for the EU to tightly regulate these killing operations via mandatory stricter procedures, as well as harmonised data collection and reporting.

Eurogroup for Animals' position

Eurogroup for Animals welcomed the [announced](#) revision of the Slaughter Regulation in the framework of the Farm-to-Fork strategy (EU, 2020). In order to guarantee animal welfare, calls on the European Commission and the European co-legislators to make the legislative text more scientifically relevant, broaden its scope to fish⁴ and make mandatory the compliance with the EU rules on animal welfare at the time of slaughter and killing also in case of European animals slaughtered outside the Union borders.

Particularly, **Eurogroup for Animals urges to:**

- Ensure that independent Official Veterinarians are present at all times in slaughterhouses. Clear rules must be set and sufficient time has to be at their disposal to ensure they can effectively oversee that welfare is guaranteed throughout the different phases of the killing process, including the arrival. To ensure independence, each Official Veterinarian shall work in an abattoir for a maximum of 18 months (after this period, they shall be moved to another plant).
- The slaughter line should be at such a speed to allow for a proper movement of the animals, thus to spare them from unnecessary fear and stress before and at stunning.
- Introduce mandatory surveillance with 'Video Content Analysis', in all the EU abattoirs. Clear rules on data storage, accessibility, and camera position must be set by law.
- Member States shall ensure that slaughterhouses workers follow the compulsory animal welfare training before entering into service.
- Introduce an exhaustive and mandatory list of European-approved methods for emergency killings as well as depopulation operations. Additionally, contingency plans for emergency killings shall also be drawn.
- Ensure that Member States correctly levy the taxes set by the EU intended to finance controls.
- Develop less painful methods to stun pigs and amend Annex I of the Slaughter Regulation to phase out the use of CO₂ at high concentrations.⁵

⁴ A series of EFSA opinions published in 2009 on fish welfare contain much of the information that should have been included in 1099/2009, and the European Commission's study SANTE/2016/G2/009 and report COM(2018)87 final demonstrate that we have the technical knowledge and that available commercial solutions have economic advantages.

⁵ Eurogroup for Animals has published an ad-hoc position paper on this issue (see Bibliography). In November 2020 the European Parliament allocated funding to research into alternative practices to CO₂ stunning.

- Phase out electrical water-bath stunning for poultry one year after the entry into force of the revised legislation, at latest, and urgently develop less painful alternatives. Meanwhile when electrical water-bath systems are used, they must achieve a stun-kill outcome.
- Implement multi-phases (ideally more than two) stunning in case of poultry killed with gas methods.
- Set effective numbers of DG SANTE audits and launch infringement procedures against countries if found in violation of the Slaughter Regulation.
- Carry out systematic checking, and amend as necessary, of the Standards Operating Procedures (SOPs) by the Member States. SOPs shall be regularly updated by the meat production businesses and transmitted to their Governments every three years. After that period of time all Member States shall analyse the latest SOPs received and prepare a Report containing statistics on the different slaughter methods used.
- Introduce a stunning control protocol in the SOPs. Such a protocol must:
 - lay down scientifically-based parameters to be checked to assess effective stunning,
 - follow as a minimum requirement the parameters set in the German handbook Animal Welfare Supervision Manual for Slaughter and Killing” (LAV, 2018).⁶
- Set mandatory and harmonised higher animal welfare provisions for mobile slaughter⁷, including the mandatory presence of an official veterinarian, requirements on the design of the slaughter unit, pre-cut stunning, and clear guidelines on the ante mortem inspections.
- Favour on-farm killing - under the supervision of an official veterinarian - for animals at the end of the production cycle (i.e. end-of-career).
- Set a tool-box of mandatory species- and category-specific Animal-Based Measures (ABMs) to evaluate animal stress and pain at the time of the killing.
- Follow up on the options discussed at the EFSA Scientific Network on Risk Assessment in Animal Health and Welfare (2016)⁸ with regards to culling during disease control operations, the following should be implemented:
 - systematic and harmonised data collection and bi-yearly analysis of the reports submitted by the Member States under Art 18 (4)
 - ad-hoc mandatory training for the operators

⁶ Reference should be made to the criteria listed in Annex E.6, E.7 a,b,c,d, of the Handbook.

⁷ Eurogroup for Animals (2019) provides a description of the mobile slaughter systems as well as an explanation of their benefits from an animal welfare perspective. Legal barriers and possible solutions to favour the uptake of such systems are also reported.

⁸ In 2016 the EFSA Scientific Network on Risk Assessment in Animal Health and Welfare discussed how to improve the reporting systems and it was suggested that EFSA could propose a modification of the reporting formats to enable data analysis. During that meeting it was also discussed the possibility of building up a comprehensive European database with the aim to monitor progress and address critical situations; as well as to create a platform to exchange best practises and share problems should be created. Unfortunately, there was no follow up action by the European Commission.

- a platform accessible also to the European Commission and official stakeholders, to exchange best practices among National Contact Points (NCPs).
- Repealing the derogation that allows slaughter without stunning, both for intra-Union consumption and export, and require mandatory pre-slaughter stunning also for the animals slaughtered in the context of religious rites.⁹

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⁹ Eurogroup for Animals has published on this issue (see Bibliography).

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