The EU Referendum result: opportunities for farm animal welfare in the UK

FROM THE PUBLIC AFFAIRS DEPARTMENT

Introduction
Although the UK sees itself as operating some of the highest animal welfare standards, examples exist where it has fallen behind some other countries in some areas. Further, in many cases, there is a disconnect between what the law provides and what we know animals need - the law has not kept pace with the findings of animal welfare science.

The UK’s devolved administrations (most animal welfare law in the UK is now devolved) have the opportunity and power to provide legal protection that better reflects what we know about the sentience and needs of animals. So leaving the EU also provides England and Wales with opportunities to go further in certain areas where there is existing European legislation.

This document outlines some key areas that the UK Government should consider for revision through developing evidence-based welfare standards for, and administering its own farm assurance scheme - RSPCA Assured - and are therefore considered both pragmatic and commercially viable as well as informed by science.

Use of subsidies to encourage higher welfare standards
Existing Problem: Although in 2015 the UK received €3.08 billion in direct support back from Europe under the CAP scheme and an additional €414 million for farmers who implemented schemes for environmental and animal welfare benefits, it was constrained by EU rules in how these payments could be spent and the amount that could be allocated to Pillar 2 schemes. Consequently only Scotland prioritised animal welfare schemes under the subsidy system.

Proposals: The UK will now have the authority to choose how to better allocate subsidies to the farming sector, once the present funding cycle finishes in 2020. The RSPCA proposes a complete reform of the subsidy system as follows:

- Anyone receiving subsidies should comply with existing legislation, enforceable through the cross compliance mechanism. This covers standards for veal calves, pigs and the general farm standards.
- A new intermediate level should be developed to deliver specific welfare-related requirements to form part of the existing agri-environment scheme. Examples of such requirements could include a farm-specific veterinary health and welfare plan in place for the farm, funding for welfare training, and welfare enhancing provisions, such as additional, effective enrichment and the provision of bedding on solid floors for pigs.
- The highest level would be reserved for funding for producers who are within widely recognised higher welfare assurance schemes and deliver standards - with validated welfare outcome assessment - higher than the intermediate level.
- Costed examples of some of these requirements, for instance on improving space for fattening pigs or converting slatted floors to solid floors, are provided in the RSPCA’s ‘Into...
Review of Scotland’s RDP, which prioritised animal welfare in 2005, found these successes:

- the scheme was very popular, being joined by 20% of all eligible registered farms and covers about 24% of the total agricultural land area;
- it resulted in a shift in spending on disease treatment to disease prevention, and helped lead to a reduction in animal health and welfare problems, such as lameness and abortions in sheep.

Amending Welfare of Animals at the Time of Killing (WATOK) Regulations 2015

Existing Problem 1: There is widespread continuing concern about the existing exemption within the WATOK regulations that allows some animals to be slaughtered without pre-stunning. The RSPCA and others (including the Farm Animal Welfare Committee and the British Veterinary Association) believe that on the basis of the available evidence indicating the suffering caused by the slaughter of conscious animals, the exemption should be removed and all animals stunned before slaughter.

Whilst the UK continues to maintain the provision in the Regulations that allows non-stun slaughter for religious purposes then it must be ensured that the provisions are used purely for those purposes only and that improvements are made to the welfare of those animals during slaughter.

Proposals:

- Post-cut stunning for ruminants: the Government should introduce a requirement to make it compulsory to deliver effective, immediate post-cut stunning of ruminant species. Although this does not represent a satisfactory solution to the issue of slaughter without pre-stunning, it will, nevertheless, reduce the total period of suffering and is a welfare gain.

- Electrical stun parameters for poultry: Where the pre-slaughter stunning of poultry is considered acceptable by religious groups (at present it is estimated that 80% of poultry slaughter for religious purposes is stunned before slaughter), minimum stun parameters for poultry killed in accordance with religious rites should be set. At present, no such parameters are prescribed and such an omission leaves this important area – which has a significant impact on poultry welfare at a critical time - unregulated. Parameters should include stun combinations that, as well as delivering an effective stun, are specific to, and considered acceptable for use by, the relevant religious authorities. These stun parameters should ensure welfare and be reliable to consistently provide an effective recoverable stun, which would be the requirement of certain religious groups. Such parameters already exist but new equipment that can reliably deliver such a stun need to be developed and so financial assistance for research is required in this area (see section below).

- Labelling: Meat sold in supermarkets, shops and other food outlets should be clearly labelled where non-stun slaughter methods have been used. Currently, people are unaware about the method by which their meat was slaughtered. It is understood that non-stunned kosher slaughtered meat enters the secular market, and it is also not clear whether meat labelled Halal has come from animals that have been stunned. An EU-wide survey reported that 72% of consumers wanted to know the method of slaughter for the meat products they eat. ‘Stunned’ or ‘Non-stunned’ are appropriate, non-offensive, factual labels for meat that provide sufficient information for the consumer to make an informed choice regarding whether the animal was subjected to such a procedure prior to neck cutting. Further, it is currently a legal requirement that the number of animals slaughtered according to religious

rites is sufficient to meet only the demand of the respective religious communities. This requirement needs better enforcement as meat enters the non-religious market due to oversupply and inability to use certain parts of the animal in the religious market. Clearer labelling, as proposed, will help with this.

Existing problem 2: The RSPCA broadly welcomed the WATOK Regulations and many of the requirements should be retained in domestic legislation. However, some requirements are of concern and should be revised to ensure a satisfactory minimum level of welfare is achieved that is also consistent with the other requirements within this piece of legislation.

Proposals:

- **Electrical waterbath stunners:** The RSPCA is concerned about the use of electrical waterbath stunners due to their actual and potential detrimental impacts on bird welfare. For example, these systems involve the shackling and inversion of live birds, which is known to be both stressful and painful. In addition, it is not currently possible to ensure all birds receive an effective stun from this process. Further, it is not possible for operators to distinguish between unconscious and immobilised birds and, therefore, to assess stun efficacy. With the majority of broilers and turkeys now being killed using gas systems, which can offer a more humane alternative, the RSPCA believes we are at a stage where electrical waterbath systems should be prohibited except under very specific circumstances, as currently set out within the RSPCA Welfare Standards.

- The Society acknowledges that, at this time, the electrical waterbath stunners are the only means considered currently acceptable in the UK to deliver a recoverable stun to poultry being slaughtered according to religious rites. Whilst the use of electrical waterbaths continues for certain purposes, effective regulation should be set to ensure, as far as possible, the humane stunning of all poultry subjected to such systems. There is clear scientific evidence to support the position that the electrical stunning parameters for poultry specified in Regulation 1099/2009 do not ensure the effective stunning of birds. As a consequence, birds can enter the neck cutting stage in a state of immobilization rather than unconsciousness. Stunning parameters should be set so that only a stun-kill, and not stun-stun, is achieved for all poultry that are not being slaughtered for religious purposes (see above). Further, the maximum shackle time should be reduced to 60 seconds and improved systems that provide a more effective and controlled electrical stun and avoid the need to shackle and invert live birds should be developed.

- **Gas killing of ducks:** Under the current legislation it is not permissible to kill ducks using gas. This should be reviewed and permitted if, and with the appropriate provisions to ensure, the gas killing of ducks offers a more humane alternative to electrical waterbath stunning.

- **Carbon dioxide concentration:** The use of carbon dioxide gas concentrations above 30% to stun any livestock should be phased out. However, whilst CO\textsubscript{2} continues to be used to stun/kill pigs, a minimum concentration of 90% CO\textsubscript{2} should be required in addition to mandating that pigs must be dead on exit from a gas system. Further, the legislative requirement that it must be possible to view animals and birds within the gas system needs to be more effectively enforced.

Amendment of Welfare of Animals in Transport Order

Existing problem 1: The UK has previously indicated they could not go further than existing EU-generated transport conditions on journey times or vehicle specifications. It is still of concern...
that the current specifications for maximum journey times, space allowances and feed/water intervals are not in line with information from scientific research on the needs of different ages, classes and species of animals - both farmed species and other animals such as dogs and cats transported in the course of trade or business. In some cases, there are no detailed requirements on issues such as space. Rules around the use of markets as a ‘rest stop’ during long journeys is also a concern given the conditions and activity generally associated with such establishments. Effective enforcement of rules is also a key area but information on numbers and quality of checks, and on the level of compliance with important provisions, is not readily available.

Proposals:

● Specifications around maximum journey times, on-board conditions and space should be be reviewed and amended as necessary to reflect best knowledge of the needs of different species, ages and classes of animal.

● A maximum journey time needs to be set as agreed in 1995 but withdrawn in 2005; the RSPCA proposes species-specific maximum times in line with those set out in the RSPCA welfare standards for farm animals, applied in practice through RSPCA Assured and by others ([www.rspca.org.uk/sciencegroup/farmanimals/standards](http://www.rspca.org.uk/sciencegroup/farmanimals/standards)).

● The criteria relating to what constitutes a suitable ‘rest stop’ for animals on long journeys should be reviewed to ensure they provide animal with the opportunity to rest undisturbed in a low stress environment.

● Enforcement processes, and the resources allocated to this area, should be reviewed with a view to ensuring they are ‘fit for purpose’ and provide robust protection to animals in transit.

Existing problem 2: Although the number of animals transported live from the UK overseas is currently low, this trade can and does continue to raise on-going concerns, particularly when the animals are going for slaughter or further fattening. A move away from EU membership could lead to reduced ability to have influence over the welfare of the animals once they leave UK shores, heightening the importance of reducing the trade to zero and instead building on an already thriving trade in meat and meat products from the UK to a large number of EU and other countries. Leaving the EU presents an opportunity to the Government to introduce its own rules preventing the ‘export’ of live animals for slaughter or further fattening. This would not only reduce the risk of the potentially serious welfare problems associated with travel, it would at the same time make the previously exported animals available to the UK market which is not self-sufficient in many meat sectors.

Proposals:

● There should be a prohibition on the transport of live animals overseas for slaughter or further fattening purposes.

● If the prohibition was not brought in, no subsidies should be given to live animals exported for slaughter.

**Inclusion of mandatory CCTV in abattoirs**

**Existing Problem:** Despite the use of CCTV in abattoirs as an aide to improving animal welfare being recommended by, among others, the Food Standards Agency\(^2\) and the Farm Animal Welfare

\(^2\) Food Standards Agency: Slaughter licensing and animal welfare. [https://www.food.gov.uk/enforcement/approved-premises-official-controls/meatplantsprems/animal-welfare#toc-5](https://www.food.gov.uk/enforcement/approved-premises-official-controls/meatplantsprems/animal-welfare#toc-5)

For further information: politicalaffairs@rspca.org.uk www.politicalanimal.org.uk

LAST UPDATED: 01.11.16  PAGE 4  PRODUCED BY: D. Bowles, M. Cooper, J. Wrathall
Committee\(^3\), the UK felt it could not implement a mandatory provision for CCTV in abattoirs as there was no provision in Regulation 1099/2009. Although 55% of white meat slaughterhouses and 43% of red meat slaughterhouses now have some form of CCTV, a level that represents an increase in availability and coverage compared to the previous survey in 2011\(^4\), there is no quality control on the placement of the cameras, or the quality and review process of the footage. It may be the case that slaughterhouses that do not have CCTV may be the worst performing in terms noncompliance under WATOK. The Welsh Government agreed in August 2016 that they would assess the need and implementation for a workable system of CCTV in slaughterhouses in their 2016/7 Animal Health and Welfare Framework.

**Proposals:**

- The RSPCA welfare standards, implemented in *RSPCA Assured* - have required mandatory CCTV in abattoirs since 2011. The cameras act not only as good deterrents against acts of animal cruelty and poor practices but they also bring other benefits:
  - increased security to the premises
  - useful training aid for slaughter men and abattoir managers, vets and meat hygiene inspectors to ensure standards are maintained and enhanced when necessary
  - enable the abattoir to provide evidence to refute false allegations of malpractice
- Standards need to be put in place (see RSPCA Welfare standards for farm animals: [www.rspca.org.uk/sciencegroup/faranimals/standards](http://www.rspca.org.uk/sciencegroup/faranimals/standards)) which specify exactly where cameras need to be placed (there are five areas in chicken abattoirs for instance), how long the footage is retained (three months), who is able to view this (auditors) and how the cameras work.
- In the past five years since RSPCA Assured made CCTV mandatory for its members, there have been no financial or membership consequences. The RSPCA estimated it cost £3-10,000 to install multiple-camera CCTV systems in each of the 46 member abattoirs, depending on the size of the abattoir.

**Implementing Method of Production labelling and the labelling of meat from animals slaughtered without pre-stunning**

**Existing Problem:** The UK felt it could not implement method of production labelling as European legislation covered country of origin. Method of production labelling identifies the farming system used to produce the food and helps consumers make an informed choice about which production methods to support through their purchases. This form of labelling has existed for shell eggs since 2004 and is generally considered to have contributed to the significant shift ways from eggs from caged hens, allowing growth of the cage-free industry in the UK. Catch method labelling for all fish products has been in place since December 2014. A 2016 Eurobarometer survey showed that 55% of UK consumers surveyed looked for animal welfare labelling when shopping. Research in 2013 surveying over a thousand people in the UK (and an equal number in France and the Czech Republic) found that over four fifths wanted to see the shell-egg labelling system extended to “all meat and dairy products” and more than three quarters stated that if method of production labelling of poultry meat were to be introduced they would be “very likely” or “quite likely” to use it\(^5\). The research also indicated that there was genuine confusion amongst consumers regarding the method

---

\(^3\) Farm Animal Welfare Committee Opinion on CCTV in slaughterhouses.  

\(^4\) FSA. 2015. Results of 2013 animal welfare survey in GB.  


For further information: politicalaffairs@rspca.org.uk  
www.politicalanimal.org.uk

LAST UPDATED: 01.11.16  
PAGE 5  
PRODUCED BY: D. Bowles, M. Cooper, J. Wrathall
of production of the animals used to produce the meat and dairy foods they buy. The RSPCA believes that consumers may switch more quickly to higher welfare products if retailers were required to label clearly the provenance of all livestock products with regard to the way the source animals were reared. The Society therefore wishes to see the extension of the egg labelling model to all animal-derived products sold within the UK and the European Union. Further, meat from animals slaughtered without pre-stunning should also be labelled (see point 2. above).

Proposals:

- Mandatory method of production labelling will help provide a fair and positive future for farmers who are prepared to invest in higher welfare systems. Consumers have proven their willingness to pay a little more for higher welfare food products, as growth in the cage-free egg market has shown.
- The use of one of four labelling terms be made mandatory. For instance, for meat chickens this would have existing terms, 'organic', 'free-range', and 'extensive indoor' and the term 'intensive indoor', should be added to describe poultry meat from birds housed in systems that are not currently eligible to use the higher welfare terms.

Developing new welfare legislation for other farm animals

Existing Problem: The EU has only agreed and implemented detailed farm animal specific legislation for laying hens, meat chickens, pigs and veal calves. Other farmed animals that do not have specific standards include ducks, dairy and beef cattle.

Proposals:

- Dairy and beef cattle: Despite the UK being a member of the OIE, which in 2014 agreed standards for dairy and beef cattle, harmonised legal requirements have not been developed for cattle. Therefore, the development of legislation, properly informed by welfare science, to protect the welfare of dairy and beef cattle should be considered as a priority.
- Other farm animals: Other farm animals that do not have detailed legal requirements relating to their husbandry and care include ducks, sheep, turkeys, salmon and trout. Detailed voluntary industry and/or private assurance scheme standards (for example, see: www.rspca.org.uk/sciencegroup/farmanimals/standards) already exist for these species but there should be mandatory regulations in place to provide minimum protection too.