



**Position FVE on the draft Regulation  
on the protection of animals at the time of killing**

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General comments

FVE wants to congratulate the Commission on the draft proposal. It is a significant step in the right direction and has the potential to improve the welfare at slaughter and killing of millions of animals. FVE especially welcomes the clear operator's responsibility for the welfare of animals during slaughter, the introduction of a certificate of competence and the need for slaughterhouses to appoint an animal welfare officer.

FVE appreciates that the current proposal is a Regulation and not a Directive. However, we share with some Member States the concern that, on specific points, their existing legislation may be overruled and that they might be required to implement less stringent rules. FVE would consider it prudent for the text of this Regulation to permit Member States a mechanism by which they would have the option to implement stricter rules for slaughtering/killing inside their own country, should they wish to do so.

FVE would wish to see additional specific controls relating to the killing of animals kept for the production of fur included in this proposal.

In this document, FVE presents its main suggestions for modifications to the current draft text in order to improve the proposal.

President

Walter Winding

Vice-Presidents

Ljiljana Markuš  
Rainer Schneichel  
Stephen Ware  
Margareta Widell

Specific comments:

**Article 1: Subject matter and scope**

Art 1 par 1 Original text	Art Par 1 Proposed modification
<p>1. This Regulation lays down rules for the killing of animals kept for the production of food, wool, skin, fur or other products, and for related operations.</p> <p>However, as regards fish, only Article 3(1) shall apply.</p>	<p>1. This Regulation lays down rules for the killing of animals kept for the production of food, wool, skin, fur or other products, and for related operations.</p> <p>However, as regards fish, <b>reptiles, amphibians, crustaceans and cephalopods</b> only Article 3(1) shall apply.</p>
<p><u>Explanation:</u> Reptiles, amphibians, crustaceans and cephalopods are also sentient beings and should be spared of any avoidable pain, distress or suffering during their killing and related operations. <a href="http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753816_1178620774242.htm">http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753816_1178620774242.htm</a></p>	

Art 1 par 2 Original text	Art Par 2 Proposed modification
<p>2. This Regulation shall not apply</p> <p>(a) where animals are killed:</p> <p>(i) during technical or scientific experiments carried out under the supervision of the competent authority.</p> <p>(ii) during hunting activity</p> <p>(iii) during cultural or sporting events</p> <p>(iv) by a veterinarian in the framework of his/her medical practice</p>	<p>2. This Regulation shall not apply</p> <p>(a) where animals are killed:</p> <p>(i) during technical or scientific experiments carried out under the supervision of the competent authority.</p> <p>(ii) during hunting activity</p> <p><b>(iii) semi domesticated deer, shot in the field and processed through a farmed game facility</b></p> <p>(iv) during cultural or sporting events</p> <p>(v) by a veterinarian in the framework of his/her medical practice</p>
<p>Explanation: Semi domesticated deer in Northern Europe, kept on extensive pasture are frequently killed with a free bullet head shot in the field adjacent to the processing facility. This procedure raises less welfare concerns that killing of wild deer.</p>	

## Article 2: Definitions

Art 2 Original text	Art 2 Proposed modification
<p>(c) “animal” means any vertebrate animal, excluding reptiles and amphibians.</p>	<p>(c) “animal” means any vertebrate animal, including birds.</p> <p><b>“Unconsciousness” is a state of unawareness (loss of consciousness) in which there is temporary or permanent disruption to brain function. As a consequence the individual is unable to respond to normal stimuli, including pain</b></p> <p><b>“Death” means a physiological state of an animal, where respiration and blood circulation have ceased as the respiratory and circulatory brain centres in the Medulla Oblongata are irreversibly inactive. Due to the permanent absence of nutrients and oxygen in the brain, consciousness is irreversibly lost. In the context of application of stunning and stun/kill methods, the main clinical signs seen are permanent absence of respiration (and also absence of gagging), absence of pulse and absence of corneal and palpebral reflex.</b></p>
<p><u>Explanation:</u> see explanation included in article 1. Definitions of unconsciousness and death are helpful for the clear understanding of the text.</p>	

## Article 4: Methods of killing

Art 4.2 Original text	Art 4.2 Proposed modification
<p>By way of derogation from paragraph 1, where such methods are prescribed by religious rites, animals may be killed without prior stunning, provided that the killing takes place in a slaughterhouse.</p> <p>However, Member States may decide not to apply that derogation.</p>	<p>By way of derogation from paragraph 1, where such methods are <b>requested</b> by religious rites, animals may be killed without prior stunning, provided that the killing takes place in a slaughterhouse <b>and the meat is destined, to the best of the operator's knowledge, to the religious community concerned.</b></p> <p>However, Member States may decide not to apply that derogation.</p> <p>Killing of animals without prior stunning shall be carried out in accordance with the rules defined in Annex V.</p>
<p><u>Explanation:</u> In several EU countries, this derogation is not used as a derogation but as a general rule. To take just one example, Belgium has a very high proportion of animals being slaughtered without prior stunning (2005: 21% calves, 10% cattle and 92% sheep) while the Muslim percentage is only about 3.5 % and the Jewish population is less than 1%. The surplus of meat is sold on the domestic or export market to consumers unaware that they are eating meat of animals which were slaughtered without prior stunning.</p> <p>Need for SOPs is vital to ensuring minimum standards and compliance</p> <p>FVE takes the position that from an animal welfare point of view, and out of respect of an animal as a sentient being, the practice of slaughtering animals without prior stunning is unacceptable under any circumstances.</p> <p>For more information: see FVE position paper on slaughter without prior stunning on <a href="http://www.fve.org/news/position_papers/animal_welfare/fve_02_104_slaughter_prior_stunning.pdf">http://www.fve.org/news/position_papers/animal_welfare/fve_02_104_slaughter_prior_stunning.pdf</a></p>	

## Article 6: Standard Operating Procedures

Art 6 par 3 Original text	Art 6 par 3 Proposed modification
<p>3. The standard operating procedures shall be made available to the competent authority upon request</p>	<p>3. The standard operating procedures shall be made available to the competent authority upon request. <b>The official veterinarian shall be notified in writing whenever a standard operating procedures has changed.</b></p> <p>4. <b>Staff competence should be ensured by regular training on the contents of the standard operating procedures</b></p> <p>4. <b>Standard operating procedures shall have a legal status; acting contrary to a standard operating procedure is generally considered as non-compliance in accordance with article 19 and 20</b></p>
<p><u>Explanation:</u> Standard operating procedures will play an essential role in protecting the welfare of animals around slaughter or killing. The people for whom they SOPs are written should be well aware of them and trained regularly in how to follow them. In addition, these SOPs will be an important tool for official veterinarians inspecting or auditing the establishment. If the SOPs turn out to be inadequate to protect the animals concerned the official veterinarian could requests to amend them (art 19.a). Failure to adhere to them needs to lead to actions from the official veterinarian.</p>	

## Article 7: Level and certificate of competence

Art 7 par 2 Original text	Art 7 par 2 Proposed modification
<p>2. The following slaughter operations shall only be carried out by persons holding a certificate of competence for such operations, as provided for in Article 18:</p> <p>(a) the handling and care of animals before they are restrained;</p> <p>(b) the restraint of animals for the purpose of stunning or killing;</p> <p>(c) the stunning of animals;</p> <p>(d) the assessment of effective stunning;</p> <p>(e) the shackling or hoisting of live animals;</p> <p>(f) the bleeding of live animals.</p> <p>3. The killing of fur animals shall be supervised by a person holding a certificate of competence as referred to in Article 18 which corresponds to all the operations carried out under his supervision.</p>	<p>2. The following slaughter operations shall only be carried out by persons holding a certificate of competence for <b>one or more of such</b> operations, as provided for in Article 18:</p> <p>(a) the handling and care of animals before they are restrained;</p> <p>(b) the restraint of animals for the purpose of stunning or killing;</p> <p>(c) the stunning of animals;</p> <p>(d) the assessment of effective stunning;</p> <p>(e) the shackling or hoisting of live animals;</p> <p>(f) the bleeding of live animals.</p> <p><b>3. delete</b></p>
<p><u>Explanation:</u> Training of the certificate of competence should be modular. The certificate of competence must specify the operations, species, equipment or methods for which the applicant has been assessed and a license will only be issued for these activities . The animal welfare officer should be trained in all modules of the certificate of competence. FVE sees no reason to make an exception for the killing of fur animals.</p>	

## Article 9: Use of restraining and stunning equipment

Art 9 Original text	Art 9 extra par 3 Proposed modification
	<b>3. Animals should only be put in the restraint device when the operator is ready to stun or kill them.</b>
<p><u>Explanation:</u> FVE recommends copying a provision of the old Directive into the new Regulation. Restraining can be quite stressful for animals and as such it is essential to keep the time in the restraining device as short as possible.</p>	

## Article 11: Construction, layout and equipment of slaughterhouses

Art 1(a) Original text	Art 1(a) Proposed text
	(a) The competent authority may grant conditional approval if it appears from the on-site visit that the establishment meets all infrastructure and equipment requirements. It shall grant full approval only if it appears from a new on-site visit carried out within one month of the granting of conditional approval that the establishment meets the other requirements of this article and article 6. If clear progress has been made but the establishment still does not meet all these requirements, the competent authority may prolong conditional authority. However, for the purposes of this regulation, conditional approval shall not exceed a total of three months.
<p><u>Explanation:</u> According to Regulation 854/ 2004 of the hygiene package, article 3 on the approval of establishments point (b) specifies that a slaughterhouse can be <i>conditionally</i> approved, and as such we should include it also in this Regulation.</p>	

Art 11.2 Original text	Art 11.2 Proposed modification
<p>2. For the purposes of this Regulation the competent authority, referred to in Article 4 of Regulation (EC) No 853/2004, shall approve for each slaughterhouse:</p> <p>(a) the maximum throughput for each slaughter line;</p> <p>(b) the categories of animals and weights for which the restraining or stunning equipment available may be used;</p> <p>(c) the maximum capacity for each lairage area intended for equidae and animals of the bovine, ovine, caprine and porcine species and poultry and lagomorphs.</p>	<p>2. For the purposes of this Regulation the competent authority, referred to in Article 4 of Regulation (EC) No 853/2004, shall approve for each slaughterhouse:</p> <p>(a) the maximum <b>line speed at the time of stunning</b> for each slaughter line;</p> <p>(b) the categories of animals and weights for which the restraining or stunning equipment available may be used;</p> <p>(c) the maximum capacity for each lairage area intended for equidae and animals of the bovine, ovine, caprine and porcine species and poultry and lagomorphs.</p> <p><b>(d) the maximum daily throughput for the abattoir</b></p>
<p><u>Explanation:</u> The maximum throughput i.e. the number of animals killed is not the same as the line speed. The maximum daily throughput is important for the construction of the slaughterhouse such as the size of the lairage room and the capacity of the chillers, etc. The maximum line speed is important for the interval stun-stick-start related procedures. In addition, filling up the line can be done much faster and therefore the speed at stunning is the crucial point The throughput for a slaughter line is dependent upon the number of slaughtermen and the hours worked.</p>	

### Article 13: Monitoring at slaughter

Art 13.1 Original text	Art 13.1 Proposed modification
<p>1. Operators shall put in place and implement appropriate monitoring procedures to verify and confirm that animals for slaughter are effectively stunned in the period between the end of the stunning process and the confirmation of death.</p>	<p>1. Operators shall put in place and implement appropriate monitoring procedures to verify and confirm that</p> <p><b>(a)</b> animals for slaughter are effectively stunned in the period between the end of the stunning process and the confirmation of death.</p> <p><b>(b) animals must be dead before any other potentially painful carcass dressing procedure is performed or treatment is applied.</b></p>
<p><u>Explanation:</u> Properly stunned animals or animals slaughtered without prior stunning should not display signs of sensibility on the bleed rail. Any animal which demonstrates any sign of regaining sensibility must be immediately re-stunned. There should be zero tolerance from the practice of beginning any slaughter procedure such as skinning the head, leg removal or scalding of an animal until the animal is dead through exsanguination.</p>	

Art 13.6 Original text	Art 13.6 new paragraph Proposed modification
	<p><b>The official veterinarian shall regularly verify the above mentioned monitoring procedures and the correct adherence to the standard operating procedures</b></p>
<p><u>Explanation:</u> The role of the official veterinarians in enforcement of the slaughter Regulation is essential.</p>	

**Article 14: Animal Welfare Officer**

Art 14 Original text	Art 14 Proposed modification
<p>1. Operators shall designate an animal welfare officer for each slaughterhouse, to be responsible for ensuring compliance with the rules laid down in this Regulation in that slaughterhouse. He or she shall report directly to the operator on matters relating to the welfare of the animals.</p> <p>2. The animal welfare officer shall be under the direct authority of the operator and in a position to require that the slaughterhouse personnel carry out any remedial actions necessary to ensure compliance with the rules laid down in this Regulation.</p> <p>3. The responsibilities of the animal welfare officer shall be set out in the standard operating procedures of the slaughterhouse and effectively brought to the attention of the personnel concerned.</p> <p>4. The animal welfare officer shall hold a certificate of competence as referred to in Article 18, which covers all the operations taking place in the slaughterhouses for which he or she is responsible.</p> <p>5. Paragraphs 1 and 4 shall not apply to slaughterhouses slaughtering less than 1 000 livestock units of mammals or 150 000 units of poultry per year.</p>	<p>1. Operators shall designate <b>a member of staff as animal welfare operative</b> for each slaughterhouse, to be responsible for ensuring compliance with the rules laid down in this Regulation in that slaughterhouse. He or she shall report directly to the operator on matters relating to the welfare of the animals.</p> <p>2. The animal welfare <b>operative</b> shall be under the direct authority of the operator and in a position to require that the slaughterhouse personnel carry out any remedial actions necessary to ensure compliance with the rules laid down in this Regulation.</p> <p>3. The responsibilities of the animal welfare <b>operative</b> shall be set out in the standard operating procedures of the slaughterhouse and effectively brought to the attention of the personnel concerned.</p> <p>4. The animal welfare <b>operative</b> shall hold a certificate of competence as referred to in Article 18, which covers all the operations taking place in the slaughterhouses for which he or she is responsible.</p> <p>5. <b>delete</b></p>
<p><u>Explanation:</u> FVE believes that every slaughterhouse, whatever its size, should have an appointed employee (not a consultant) as Animal Welfare Operative. In small abattoirs it could be the person holding the certificate of Competence or the Food Business Operator himself. FVE prefers the term “operative” over “officer” as officer could be confusing as it is usually used for a person appointed by a public or civil office. This AWO must be a member of staff responsible for animal welfare within the premises of slaughterhouse, including field lairage, and from the time of arrival of animals and until they are killed or dead. In addition, for consistency, this Regulation should not use a definition for small slaughterhouses with livestock units when this concept was rejected in the newly adopted hygiene package. Similar standards of animal welfare must be applied in all slaughter establishments.</p>	

## Article 17: Reference centres

Art 17 Original text	Art 17 Proposed modification
<p>1. Each Member State shall appoint a national reference centre (hereinafter referred to as the “reference centre”) to perform the following tasks:</p> <p>(a) provide scientific and technical expertise relating to the approval of slaughterhouses;</p> <p>(b) carry out assessments of new stunning methods;</p> <p>(c) actively encourage the development by operators and other interested parties of codes of good practice for the implementation of this Regulation and publish and disseminate such Codes, and monitor their application;</p> <p>(d) develop guidelines for the competent authority for the purposes of this Regulation;</p> <p>(e) accredit bodies and entities for the issuance of certificates of competence, as provided for in Article 18;</p> <p>(f) correspond and cooperate with the Commission and other reference centres, in order to share technical and scientific information and best practices as regards the implementation of this Regulation.</p> <p>2. Within one year from the date of the entry into force of this Regulation, Member States shall submit details of their reference centre to the Commission and the other Member States, and shall make such information publicly available on the internet.</p> <p>3. Reference centres may be established as a network, made up of separate entities, provided that all the tasks listed in paragraph 1 are allocated for all the relevant activities taking place in the Member States concerned.</p> <p>Member States may appoint for an entity located outside their own territory to carry out one or more of those tasks.</p>	<p>1. Each Member State shall appoint a <b>national</b> reference centre (hereinafter referred to as the “reference centre”) to perform the following tasks:</p> <p>(a) provide scientific and technical expertise relating <b>to procedures of approval or conditional approval</b> of slaughterhouses;</p> <p>(b) carry out assessments of new stunning methods;</p> <p>(c) actively encourage the development by operators and other interested parties of codes of good practice for the implementation of this Regulation and publish and disseminate such Codes, and monitor their application;</p> <p>(d) develop guidelines for the competent authority for the purposes of this Regulation;</p> <p>(e) accredit bodies and entities for the issuance of certificates of competence, as provided for in Article 18;</p> <p>(f) correspond and cooperate with the Commission and other reference centres, in order to share technical and scientific information and best practices as regards the implementation of this Regulation.</p> <p>2. Within one year from the date of the entry into force of this Regulation, Member States shall submit details of their reference centre to the Commission and the other Member States, and shall make such information publicly available on the internet.</p> <p>3. Reference centres <b>should</b> be established as a network, made up of separate entities, provided that all the tasks listed in paragraph 1 are allocated <del>for all the relevant activities taking place in the Member States concerned.</del></p> <p>Member States may appoint for an entity located outside their own territory to carry out one or more of those tasks.</p>
<p><u>Explanation:</u> Small countries may not want to have a reference centre themselves but rather use a reference centre in another country.</p>	

## Article 18: Certificate of competence

Art 18 Original text	Art 18, extra para 6 Proposed modification
	6. The Official Veterinarian must, through audit and personal observation, be satisfied that the holder of a certificate has the necessary knowledge is practically competent to carry out the tasks for which he/she has been trained.
<u>Explanation:</u> The Competent Authority has responsibility to ensure that the Food Business Operator carries out their responsibilities with regard to this Regulation; see article 19.	

## Article 19: Non-compliance

Art 19 Original text	Art 19 Proposed modification
<p>For the purpose of Article 54 of Regulation (EC) No 882/2004, the competent authority may in particular:</p> <p>(a) request operators to amend their standard operating procedures and in particular slow down or stop production;</p>	<p>For the purpose of Article 54 of Regulation (EC) No 882/2004, the competent authority <b>shall</b> in particular:</p> <p>(a) <b>require</b> operators to amend their standard operating procedures and in particular slow down or stop production;</p>
<u>Explanation:</u> Article 19 a permits the competent authority to “request” operators to amend their standard operating procedure in case of non-compliance. FVE strongly believes that the competent authority should have the right and power to require operators to amend their standard operating procedures if the welfare outcome is poor or compromised?	

**Article 24.1: Transitional provisions**

Art 24 Original text	Art 24 Proposed modification
<p>1. Until 31 December 2018, Article 11(1) shall only apply to new slaughterhouses or for any new construction, layout or equipment covered by the rules set out in Annex II, which have not entered into operation before the date of [application/entry into force] of this Regulation.</p> <p>2. Until 31 December 2014, Member States may provide for certificates of competence, as referred to in Article 18, to be issued without examination to persons demonstrating relevant uninterrupted professional experience of at least [ten] years.</p>	<p>1. Until 31 December <b>2012</b>, Article 11(1) shall only apply to new slaughterhouses or for any new construction, layout or equipment covered by the rules set out in Annex II, which have not entered into operation before the date of [application/entry into force] of this Regulation.</p> <p>2. Until 31 December 2014, Member States may provide for certificates of competence, as referred to in Article 18, to be issued without examination to persons demonstrating relevant uninterrupted professional experience of at least [ten] years <b>after positive assessment by the official veterinarian.</b></p>
<p><u>Explanation:</u> The transition period in paragraph one of 7 years after the coming into force of tis proposal is too long. It is not because somebody has been working e.g. 10 years in the business, that he is certainly competent. FVE believes that even persons working long time in the business should be assessed by the Official Veterinarian to make sure they have the correct knowledge to deserve the certificate of competence. Also, please take note that these more experienced people will serve as trainers for younger personnel. If they do not have the right skills and attitude, they will not pass it on to the newer generation.</p>	

## ANNEXES

### General comment:

In Annex I, list of methods of stunning and killing and related specifications, all methods are listed which can be used for stunning and killing. FVE is concerned that this approach bans certain methods for certain applications. The regulation and procedures being developed should ban equipment that fails not certain methods.

### **Annex I, Chapter I, Table I**

#### Original text:

No	Name	Description	Category of animals	Key parameters	Specific requirements Annex II
2	Non-penetrative captive bolt pistol	Severe damage of the brain by the shock of a captive bolt without penetration.	Ruminants up to 10 kg, poultry and lagomorphs.	Position and direction of the shot. Appropriate velocity and diameter of bolt according to animal size and species.	Not applicable.

#### Proposed amendment:

No	Name	Description	Category of animals	Key parameters	Specific requirements Annex II
2	Non-penetrative captive bolt pistol	Severe damage of the brain by the shock of a captive bolt without penetration.	Ruminants up to <b>250 kg</b> , poultry and lagomorphs.	Position and direction of the shot. Appropriate velocity and diameter of bolt according to animal size and species.	Not applicable.

## Annex I, Chapter I, Table 2: Electrical methods

Add method:

No	Name	Description	Category of animals	Key parameters	Specific requirements Annex II
4	Two-cycle stun/kill	Exposure of the brain to a current generating a generalised epileptic form on the electroencephalogram followed by exposure of the heart to a current sufficient to induce cardiac arrest.	All species	Current cycles: including the heart must be applied with a 50 Hz sine wave alternating current (AC). Minimum current (A or mA) Minimum voltage (V) Minimum time of current flow. Frequency of calibration of the equipment. Optimisation of current flow. Prevention of electric shock before stunning.	Point 3. Point 4.1. Specify in Annex II the minimum requirement for inducing cardiac arrest in all species e.g. cattle: 1.5 A; pig: 1.0 A; sheep & goat: 1.0 A chicken: 240 mA turkey: 400 mA. - as in Table 1

### Annex I, Chapter I, Table 3: gas methods

#### Original text:

No	Name	Description	Category of animals	Key parameters	Specific requirements Annex II
1	Carbon dioxide at high concentration	Exposure of conscious animals to a gas mixture containing more than 30% carbon dioxide.	Pigs, poultry and fur animals.	Carbon dioxide concentration. Duration of exposure. Maximum stun-to-stick interval.	Point 6. Point 7 for poultry.
2	Carbon dioxide at low concentration	Exposure of conscious animals to a gas mixture .	Poultry (in a multiple phase system) pigs and fur animals	Carbon dioxide concentration. Duration of exposure. Maximum stun-to-stick interval	Point 7 for poultry.

#### Proposed amendment:

No	Name	Description	Category of animals	Key parameters	Specific requirements Annex II
1	Carbon Dioxide	Exposure of conscious animals to a gas mixture containing more than 30% carbon dioxide.	Pigs, poultry and <b>mink</b>	Carbon dioxide concentration. Duration of exposure. Maximum stun-to-stick interval (pigs).	Point 6.
2	Carbon Dioxide	Exposure of conscious animals to a gas mixture containing less than 30% carbon dioxide. K: then the low oxygen concentration < 2% must be mentioned as well. Otherwise it is not acceptable for pigs.	Poultry, pigs and fur animals	Carbon dioxide concentration. Duration of exposure.	Point 7 for poultry.

**Annex I, Chapter II, Table 1:**

Original text:

Category of animals	Bovines of 6 months and older	Bovines less than 6 months	Ovine and caprine	Porcine	Chicken	Turkeys
Minimum current	1.28 A	1.25 A	1.00A	1.30 A	240 mA	400 mA

Proposed amendment:

Category of animals	Bovines of 6 months and older	Bovines less than 6 months	Ovine and caprine young	<b>Adult Ovine and caprine</b>	Porcine	Chicken	Turkeys
Minimum current	K: 1,5 A	1.25 A	1.00 A	<b>1.50 A</b>	1.30 A 1,5 A if > 130 kg LW	240 mA	400 mA

Explanation: Practical experience states that adult sheep & horned animals need higher currents. Security interval, especially in the case of unprecise electrode position.

**Annex II, 2 Lairage facilities for animals not delivered in containers**

Annex II 2.3 Original text	Annex II 2.3 Proposed modification
2.3 There shall be a waiting pen, with a level floor and solid sides, between the holding pens and the race leading to the point of stunning, to ensure a steady supply of animals for stunning and killing and to avoid animal handlers having to rush animals from the holding pens. The waiting pen shall be so designed that animals cannot be trapped or trampled.	2.3 <b>The design of the area</b> between the holding pens and the point of stunning shall ensure a steady supply of animals for stunning and killing and avoid animal handlers having to rush animals from the holding pens. This <b>area</b> shall be so designed that animals cannot be trapped or trampled.
<u>Explanation:</u> In Scandinavia, where most cattle are held in individual boxes as in some abattoirs with group stunning of pigs, waiting pens are not used and are not useful.	

## Annex II, 3 restraining equipment and facilities

Annex II 3.2 Original text	Annex II 3.2 Proposed modification
Restraining boxes used in conjunction with a captive bolt shall be fitted with a device that restricts both the lateral and vertical movement of the head of the animal.	Delete
<p><u>Explanation:</u>. The use of a device that restricts both the lateral and vertical movement of the head may assist the accuracy of the stun under some conditions. However, under others, such as where the size of animals varies, it may be contra-indicated.</p> <p>The Regulation should allow the FBO the freedom to adopt whatever system works under the particular circumstances of the specific slaughterhouse.</p>	

## Annex II, 5, Waterbath stunning equipment

Annex II 5.1 Original text	Annex II 3.2 Proposed modification
5.1 Shackle lines shall be designed and positioned in such a way that birds suspended on them are clear of any obstruction and that disturbance to the animals is reduced to a minimum.	5.1 Shackle lines shall be designed and positioned in such a way that birds suspended on them are clear of any obstruction and that disturbance to the animals is reduced to a minimum. <b>The maximum shackling time must be one minute for chickens and two minutes for turkeys.</b>
<p><u>Explanation:</u>. The period which the birds must be restricted so as to minimize distress to the birds. The times given are sufficient for the birds to become calm after shackling.</p>	

## Annex II, 7 gas stunning equipment for poultry point 2

Annex II 7.2 Original text	Annex II 7.2 Proposed modification
<p>7.1 Points 6.1 and 6.2 shall apply to gas stunning equipment for poultry.</p> <p>7.2 Facilities for poultry shall be designed and built so that animals are only conveyed into the gas mixtures in transport crates without being unloaded</p>	<p>7.3 Points 6.1, 6.2, <b>6.3 and 6.4</b> shall apply to gas stunning equipment for poultry.</p> <p>7.2 Facilities for poultry shall be designed and built so that animals are only conveyed into the gas mixtures <b>either</b> in transport crates without being unloaded <b>or being gently tipped onto a belt if it is proven that unloading of the crates does not lead to any avoidable pain and suffering</b></p>
<p><u>Explanation:</u></p> <p>7.1 For poultry also, it shall be possible to visually inspect the animals during the induction phase because if something goes wrong with the gas concentration you need to see the animals. Also 6.4 needs to be added, as poultry also need sufficient space so the they are not stacked on each other and that there is enough space for ever animal to inhale the gas.</p> <p>7.2 Many animal-friendly methods exist in which animals are unloaded from their crates and are gently, without falling and pilling on top of each other, being lifted on the belt. – stunning / killing of poultry in transport containers maximizes the bird welfare benefits of using gas mixtures and is the ultimate motive of this recommendation.</p>	

**Annex III, paragraph 1.2**

Annex III 1.2 Original text	Annex III 1.2 Proposed modification
<p>Animals must be unloaded as quickly as possible after arrival and subsequently slaughtered without undue delay.</p> <p>In the case of poultry or lagomorphs, the total time of transport added to the time spent between unloading and slaughter shall not exceed 12 hours.</p> <p>In the case of mammals, except lagomorphs, the total time of transport added to the time spent between unloading and slaughter shall not exceed:</p> <p>(a) 19 hours for unweaned animals;            (b) 24 hours for equidae and pigs;            (c) 29 hours for ruminants.</p> <p>After the expiry of those time limits, the animals must be lairaged, fed, and subsequently given moderate amounts of food at appropriate intervals. In such cases, the animals shall be provided an appropriate amount of bedding or equivalent material which guarantees a level of comfort appropriate to the species and the number of animals concerned. This material must ensure adequate absorption of urine and faeces.</p>	<p><b>Animals which are not taken directly upon arrival to the place of slaughter must be unloaded without delay and have drinking water available to them from appropriate facilities at all times.</b></p> <p><b>Animals which have not been slaughtered within 12 hours of their arrival must be fed, and must subsequently be given moderate amounts of food at appropriate intervals. Food must be provided in such a way that will permit the animals to feed undisturbed.</b></p> <p><b>Animals which are kept for 12 hours or more at a slaughterhouse must be lairaged in such a way that they can lay down without difficulty.</b> In such cases, the animals shall be provided with a resting place with good drainage, if possible with bedding or other materials increasing their comfort. <b>Animals having been tethered on farm, may be tethered in lairage, as long as this does not interfere with eating, drinking or resting facilities.</b></p> <p>In the case of poultry or lagomorphs, the total time of transport added to the time spent between unloading and slaughter shall not exceed 12 hours.</p>
<p><u>Explanation:</u> The wording of the old Directive Annex A Paragraph II 9 and 10 was more practical and better enforceable than the new wording, so we propose to keep the same wording as in the old Directive.            It must be assured that for red meat animals transport vehicles cannot be used as “lairage” facilities.</p>	

### Annex III, paragraph 1.5

Annex III 1.5 Original text	Annex III 1.5 Proposed modification
<p>For the purpose of slaughter, unweaned animals, lactating dairy animals, females having given birth during the journey or animals delivered in containers shall be given priority over other types of animal. If this is not possible, arrangements shall be made so as to relieve them from their suffering, in particular by:</p> <p>(a) milking dairy animals at intervals of not more than 12 hours;</p> <p>(b) providing appropriate conditions for suckling and the welfare of the newborn animal in the case of a female having given birth;</p> <p>(c) providing water in the case of animals delivered in containers.</p>	<p>For the purpose of slaughter, unweaned animals, lactating dairy animals, females having given birth during the journey or animals delivered in containers shall be given priority over other types of animal. <del>If this is not possible,</del> arrangements shall be made so as to relieve them from their suffering, in particular by:</p> <p><b>(a) lactating animals have to be slaughtered within 12 hours upon arrival at the slaughterhouse, or immediately if they are considered to suffer undue stress due to an overstocked udder ;</b></p> <p><b>(a2) slaughtering unweaned animals immediately on arrival/within 2 hours</b></p> <p>(b) providing appropriate conditions for suckling and the welfare of the newborn animal in the case of a female having given birth;</p> <p>(c) providing water in the case of animals delivered in containers.</p> <p>Ill or injured animals must be slaughtered <b>immediately on arrival/within 2 hours</b> <b>If they apparently suffer from severe pain, have deep wounds, are severe bleeding, they have to be slaughtered immediately</b> Non ambulatory animals must be slaughtered on the spot</p>
<p><u>Explanation:</u> Lactating cows usually do not 'let their milk down' in the lairage, as such it should be foreseen that they can be slaughtered as soon as possible and in any case within 12 hours of arriving at the slaughterhouse. To the best of our knowledge, it is nearly impossible to feed calves/lambs at the slaughter house, so they should be slaughtered without delay after arrival.</p>	

### Annex III, paragraph 2.1

Annex III 2.1 Original text	Annex III 2.1 Proposed modification
<p>2.1 Each animal shall have enough space to stand up, lie down and turn around.</p>	<p>2.1 Each animal shall have enough space to stand up, lie down and turn around. The requirement that the animals shall be able to turn around shall not apply for tethered animals and animals lairaged in individual boxes.</p>
<p>In the Nordic countries, many slaughter establishments for cattle use single boxes for 80-90 % of these animals. In such systems turning around is impossible, and no lairage could be approved without dramatically changes.</p>	

**Annex III, paragraph 3.1**

Annex III 3.1 Original text	Annex III 3.1 Proposed modification
Where one person is responsible for stunning, shackling, .....and bleeding of animals, that person must carry out all those operations consecutively on one animal before carrying out any of them on another animal.	Where one person is responsible for stunning, shackling, .....and bleeding of animals, that person must carry out all those operations consecutively on one animal before carrying out any of them on another animal. <b>This requirement does not apply when group stunning is used.</b>
<u>Explanation:</u> This requirement is not practical for plants with group stunning or relatively low speed (less than 100 animals/hour), and the stunning is performed in one step any way, hence the procedure facilitating the shortest stun-stick interval for the last animal is the best.	

**Annex III, paragraph 3.4**

Annex III 3.4 & 3.5 Original text	Annex III 3.4 & 3.5 New paragraphs
	<p><b>3.4 An animal which has been stunned must be bled without delay, and, if any case, within the maximum time stated below:</b></p> <p><b><u>Intervals stun-stick</u></b></p> <p><b>8 s after head-only electric stunning of sheep</b></p> <p><b>12 s after head-only electric stunning of calves</b></p> <p><b>15 s after head-only electric stunning of pigs</b></p> <p><b>3.5 For poultry, no further processing must take place 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.</b></p>
<p><u>Explanation:</u> It is essential that stunned animals are bled without delay in order to ensure that death occurs by exsanguinations before they have the opportunity to recover consciousness.</p> <p>It is essential that poultry have died by exsanguinations before entering the scald tank.</p>	

## ANNEX V

### MINIMUM REQUIREMENTS FOR SLAUGHTER WITHOUT PRIOR STUNNING

(As referred to in article 4)

The following minimum requirements shall be respected for the slaughter of animals without prior stunning:

- (a) Slaughterhouses should be specifically approved for this purpose and the approval should be subject to suitable equipment being available.
- (b) Slaughtering outside a licensed slaughterhouse must not be allowed. No exceptions shall be allowed.
- (c) Staff involved at the point of slaughter must be specifically trained and certified for the purpose. This training must include technical aspects to be decided by the competent authority in addition to any training given by religious authorities. It should include an examination and continual improvement of the slaughterers. The initial training should be carried out on stunned or dead animals.
- (d) There should be a written Standard Operating Procedure, in the local language, concerning ritual slaughter available for veterinarians
- (e) Veterinarian should be informed well in advance of any changes to the SOP
- (f) The slaughtering process must be in the permanent presence of a veterinarian who has the authority and obligation to intervene whenever necessary.
- (g) Animals for ritual slaughter must be pre-selected. Only animals destined for the consumption of the religious community concerned should be subject to the ritual.
- (h) The farmer who produced the animal has the right to know how his animal will be slaughtered.
- (i) Should slaughtering take place without prior stunning, animals should be stunned immediately following the cut.
- (j) For poultry, the speed of the line must be adapted to guarantee that each animal can be slaughtered manually.
- (k) The knife has to be razor sharp and its length must be at least twice of the width of the neck.
- (l) Animals shall not be restrained until the slaughterman is ready to slaughter them.
- (m) The cut must then be carried out immediately after restraint and consist of one uninterrupted movement in which both carotid arteries and both jugular veins are cut.
- (n) The wound edges must not come together and the animal must remain in the restrained, position until death ensues.
- (o) The wound should not be touched or manipulated during bleeding or until the animal is dead
- (p) If bleeding is impaired there must be stunning before the cut is repeated