

The restraint of cattle for slaughter

The animal welfare team have received a number of queries recently relating to cattle that are too large to enter the stun box, either due to their size or the presence of horns, and whether it is acceptable to slaughter the animals outside the stun box.

Legal requirements

In **Regulation (EC) No 1099/2009** Article 2 (p) restraint is defined as:

'the application to an animal of any procedure designed to restrict its movements sparing any avoidable pain, fear or agitation in order to facilitate effective stunning and killing'

Regulation (EC) No 1099/2009 has requirements for the use and maintenance of restraint equipment in Article 8 and 9. These require there are instructions available for new equipment installed after January 2013, and maintenance procedures and records retained for restraining equipment. WATOK Schedule 1 has additional provisions on restraint of adult bovines.

Article 8

Instructions for the use of restraining and stunning equipment

Products marketed or advertised as restraining or stunning equipment shall only be sold when accompanied by appropriate instructions concerning their use in a manner which ensures optimal conditions for the welfare of animals. Those instructions shall also be made publicly available by the manufacturers via the internet.

Those instructions shall in particular specify:

- (a) *the species, categories, quantities and/or weights of animals for which the equipment is intended to be used;*

Restraining boxes need to be fitted with a device that restricts both the lateral and vertical movement of the head of the animal, it should be noted that this only applies where a pneumatic captive bolt is in use.

- (b) *the recommended parameters corresponding to the different circumstances of use, including the key parameters set out in Chapter I of Annex I;*
- (c) *for stunning equipment, a method for monitoring the efficiency of the equipment as regards compliance with the rules laid down in this Regulation;*
- (d) *the recommendations for maintenance and, where necessary, calibration of the stunning equipment.*

Article 9

Use of restraining and stunning equipment

1. *Business operators shall ensure that all equipment used for restraining or stunning animals is maintained and checked in accordance with the manufacturers' instructions by persons specifically trained for that purpose. Business operators shall draw up a record of maintenance. They shall keep those records for at least one year and shall make them available to the competent authority upon request.*

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There are further requirements on restraint in Regulation (EC) No 1099/2009 Annex II which apply to equipment installed after January 2013 and all existing equipment after 8 December 2019. In particular note that Regulation (EC) No 1099/2009 Annex II, 3.2 restraining boxes need to be fitted with a device that restricts both the lateral and vertical movement of the head of the animal, it should be noted that this only applies where a pneumatic captive bolt is in use.



The most specific requirements on restraint of adult bovines are in **WATOK, England 2015 and Wales 2014**.

Schedule 1 applies to all approved slaughterhouses and requires a stunning pen to be used for adult bovine animals. There are no exceptions for a large or horned animal or in the case of free bullet use. Paragraph 8 and 19 are both applicable.

Restraining bovine animals

19. *Without prejudice to the generality of paragraph 18, no person may stun or kill an adult bovine animal unless at the time it is stunned or killed it is confined in a stunning pen or in a restraining pen which (in either case) is in good working order.*

Stunning pens

8. *The business operator must ensure that a stunning pen used to restrain adult bovine animals for the purpose of stunning is constructed so as to -*

(a) *permit one animal at a time to be confined in it without discomfort;*

(b) *prevent any substantial movement forwards, backwards or sideways of an animal confined in it;*

(c) *restrict the movement of the head of an animal confined in it so as to permit accurate stunning and allow the head of an animal to be released immediately after the animal has been stunned; and*

(d) *allow unimpeded access to the forehead of an animal confined in it.*

This requires all adult bovines to be stunned or killed in a stunning pen. Adult bovine animals identified as unfit for human consumption in the slaughterhouse will need to be restrained in the same way as other adult bovines even if not entering the food chain. The shooting of these unfit animals without restraint is only permissible where they are recumbent or unable to move.

To note: the restraining pen mentioned in paragraph 19 normally applies to adult bovines slaughtered by religious rites as specified in WATOK Schedule 3 without prior stunning and these restraining pens must to be approved by the Food Standards Agency (FSA).

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Head restraint

Regulation 8, (c) requires there is a means of restricting the movement of the head and this can either be a passive or active head lift or an active restraint.

Active restraints involve the use of moving parts, such as lateral or vertical yokes, chin lifts, etc. Where fitted they must be in working order.

In the majority of cases, passive restraint systems will be the most appropriate. They should be carefully designed to reduce the movement of the head without impeding access to the stunning pen and should not distract the animal. For example, internal fittings can be used to hang shelf systems. A head shelf is often fitted into an existing box and as such there may be limitations to the design because of the way animals are released from the box after stunning. There are various designs of shelves used for passive restraint: a solid box, a fixed piece of curved metal, or a metal shelf held by a counter balance (Figures A-C below, picture provided by the Humane Slaughter Association). When swing doors are used for the exit of a carcass, a fixed shelf is suitable. However, if the exit door fully rotates and is the full length of the box, a counter-balanced shelf may be more

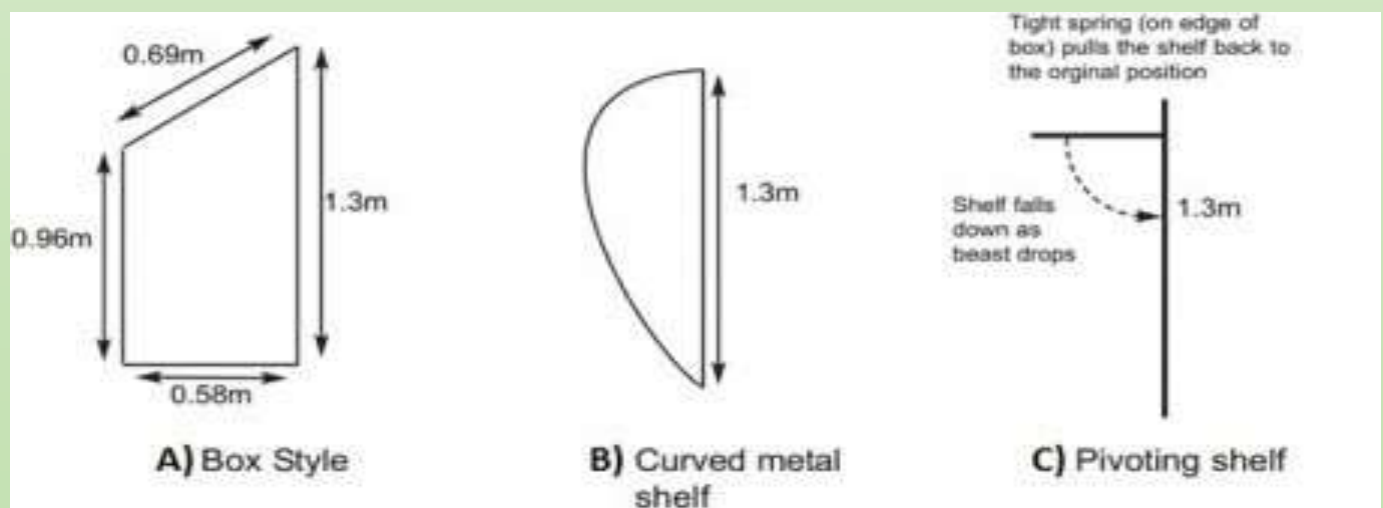
suitable as the shelf drops with the weight of the animal's head, facilitating removal of the carcass.

Some lively animals have been known to use a shelf as a step to escape from the stun box, this can be prevented by careful placement of a bar across the top of the stun box, positioned above the withers. Shadows or contrasting colours in the box which may distract the animal from entering should be avoided.

What action is needed

In effect these requirements mean that an adult bovine cannot be stunned or shot in the lairage or other area in the slaughterhouse unless it is restrained in accordance with the requirement of WATOK Schedule 1, 8.

If an animal has gone down or is unable to walk without suffering pain or distress and is in the transport vehicle or lairage then it can be stunned or shot where it is following discussion and agreement with the Official Veterinarian (OV). During non-working hours or when the OV is unavailable the emergency slaughter provision applies and the Animal Welfare Officer (AWO) can decide to slaughter the animal where it is lying without delay to prevent further pain distress or suffering. In such cases the carcass is not acceptable for human consumption.



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Occasionally some bovine animals can be, or become, very aggressive and dangerous to handle especially when trying to move them through a lairage handling system. In such exceptional cases where there is a real and present risk to the physical safety of any people trying to handle such animals provision may be made to slaughter them using a free projectile without requiring restraint.

Following a specific site Standard Operating Procedure (SOP) for fractious animals a health and safety risk assessment must be made by an AWO / Health and Safety member of staff and where a fractious animal is deemed to be a health and safety risk to any person handling the animal a suitably qualified person may shoot the animal using a free projectile eg rifle or shotgun.

Where such an assessment is needed to be made during normal operational hours the OV should be informed and made fully aware that a free projectile is to be used. The OV should always be informed if animals are killed in the lairage outside operating hours.

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If such animals have passed ante-mortem inspection before slaughter, then the animal may be eligible for human consumption following post-mortem inspection. In an exceptional case a fractious animal that has escaped from the slaughterhouse that has been subject to Veterinary ante-mortem can be shot using a free bullet without restraint. This must be agreed with the OV and subject to safety considerations and FSA staff should remain in a safe place if a free bullet is used. These procedures should be reflected in the operator's SOP and deliveries managed to ensure that only adult bovines that can be handled with the existing premises stunning box are accepted. Slaughterhouse operators should ensure they only purchase or accept for slaughter animals that their facilities can cope with. If an animal is accepted that is too large because of its size or the size of its horns and cannot be stunned in the stunning box despite the Food Business Operator's (FBO's) procedures in the SOP being followed a movement licence should be requested by the operator, or person in charge, from the Animal and Plant Health Agency (APHA) to allow the animal to move to a premises where the facilities are suitable for handling a large or horned adult bovine.

APHA do not have any powers to authorise the stunning or killing of an adult bovine other than in a stunning or restraining pen. In cases where this is suggested by APHA the OV must ensure that the adult bovine animal is not shot in the lairage but either correctly restrained or moved to another premises. The Area Veterinary Manager (AVM) and Field Veterinary Leader (FVL) / Field Veterinary Co-ordinator (FVC) must be informed of any such decision by APHA.

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The shooting or stunning of **healthy** adult bovines in the lairage or other areas without restraint in a stunning box is not permitted. During normal working hours any bovines that are considered to be unfit or unable to be moved must be discussed with the OV and a procedure agreed to stun and bleed the animal without any pain distress or suffering. During non-working hours or when the OV is unavailable emergency slaughter provision applies and the AWO may decide to slaughter the animal where it is lying without delay.

Stunning box in lairage

Where an FBO handles large bovines that have difficulty entering the race and there is no intention to modify or upgrade the current stunning pen consideration could be given to designing and installing a stunning pen within the lairage, for example in an existing pen.

Such a facility must comply with the same requirements as the usual stunning box in the slaughter hall. In addition, provisions need to be made for the slaughter of the animal hygienically and in a welfare friendly manner. In particular there must be adequate provision for the collection and disposal of blood in compliance with legislative requirements.

Where APHA refuse a movement licence the FVL or FVC can authorise the OV to allow an animal to be shot in a place other than a stunning pen.

The legislation requires that only one animal is restrained and that there should be no substantial movement of the animal forwards, backwards or sideways. There will need to be a head restraint. A passive restraint similar to those in the figures could be installed at the front with a moveable bar to prevent backwards forwards and sideways movement.

Where the FBO intends to construct an alternative facility for the restraint of adult bovines the OV must ensure that the FVL is informed so they can consider if there are any requirements for a curtilage or approval review.

Where there is no other facility

In an exceptional case, when APHA refuse a licence to move an adult bovine, the OV should contact the FVL or FVC and AVM responsible for the premises and agree what action should be taken. The FVL or FVC will need to verify that APHA have refused a movement licence for the animal and the grounds for doing so. Where APHA refuse a movement licence the FVL or FVC can authorise the OV to allow an animal to be shot in a place other than a stunning pen. In each case this must still be recorded as a non-compliance and following the enforcement hierarchy, written advice or, in repeated cases, a referral for investigation should be considered. In such cases the FBO has failed to follow their SOP and not accept such an animal.

Where the SOP does not cover this scenario then the OV should require that the SOP is updated to reflect the provisions. The enforcement hierarchy should also be followed in this scenario. This decision should be recorded in the day book by the OV, and a note made by the FVL or FVC of the decision.

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