On-Farm and Local Slaughter Consultation

Thursday, 8th – Friday, 9th November 2018

REPORT

Local and on-farm slaughter facilitates the distribution of meat along short, traceable supply chains, and supports high-quality produce and better animal welfare. Local abattoirs help farmers extract a premium for locally produced meat and are essential to the existence of much niche farming.

The number of abattoirs in the UK has fallen sharply over the past ten years. Abolition of the concept of low-throughput abattoirs in 2006 has resulted in some abattoirs increasing their throughput to take up demand, but there are significant gaps on the map, especially when considering individual species or cull animals. Small abattoirs are disproportionately burdened by regulation and consumer ignorance about meat production when they need vigorous support as a vital link in the UK's food chain.

But the abattoir system in the UK has evolved as it has because of real, ongoing pressures and demands. To help existing and future abattoirs, we must

- tackle only those things we can influence; and
- exert influence for improvements that are sustainable.

Participants enlarged upon the title topic to include a broader analysis of UK slaughtering practices and influences on them, and so reached agreement on a number of actions which more specifically could help local abattoirs and on-farm slaughter facilities to flourish in future.

Without local abattoirs

- Without local abattoirs, small producers could not extract a market premium for locally-produced meat. Communities would no longer have access to locally-grown meat and the diversity and perhaps number of the UK's livestock population would decrease.
- With less choice of local abattoirs, and sometimes no option at all for the handling of animals slaughtered on-farm, illegal slaughter would increase.
- The cost of transporting animals and carcases further would put more small farmers out of business and increased mileage also adds environmental costs.

Participants observed that further losses of small, local abattoirs will damage the UK's food chain. However, to invest in new or mobile abattoirs would be to try to swim against the strong economic and regulatory currents that have brought us to the present situation – while, too, the implications of Brexit for UK meat production remain unclear. On the other hand, seasonal increases in demand for slaughter may justify investment in pop-up abattoirs where most needed.

Animal welfare

A workable rule of thumb for animal welfare before stun and slaughter is 'anything unfamiliar is stressful'. Respect for animals as sentient creatures dictates that they must experience minimal discomfort on their way to and during slaughter. Low stress and a clean kill may also result in a higher quality of meat.

Transport is often cited as a welfare issue. Whatever distance is travelled, many factors affect comfort, including: familiarity with handling and with the vehicle; loading and unloading; space and bedding; access to water and food (on longer journeys); smoothness of ride (road, driver). Under ideal conditions, transport may be tolerable, but any discomfort at all experienced during transit is worse for continuing longer.

During stunning and slaughter, animals must not experience unnecessary pain nor regain consciousness (after stunning and before slaughter). Approved methods of stunning and slaughter rely on well-trained, conscientious operators using well-maintained equipment. In the UK, at present, EU law requires an official veterinarian (OV) to be present at the slaughterhouse to see that standards for animal welfare are maintained, among other responsibilities. The pace and scale of small, local abattoirs help OVs to build communicative, personal relationships with food business operatives, which can be positive for animal welfare.

Standards occasionally fall short of the law through unwitting misuse – for example, an inexperienced OV insisting that two groups of nine and four pigs from two farms be regrouped as eight and five to fit guidelines for available lairage, ignorant of the greater distress this would cause both groups – or knowing abuse going uncorrected – e.g., failing to provide water, kicking an animal, using faulty equipment, etc.

Advantages and disadvantages are perceived for both on-farm slaughter and slaughter at a large abattoir. Where there is less pressure to process as many animals as possible in a given period of time, more care can be taken over each animal's transition but, equally, it could be argued that each animal presents an individual challenge. Larger abattoirs may avail of more polished facilities, processes, and professional training but it can be argued that their more industrialised, repetitious slaughtering system necessarily drifts towards prioritising speed and system efficiency over hygiene and welfare concerns. There are also significant differences in method/efficiency issues between different species. Ultimately, the individual doing the stunning and slaughter must be competent, alert, properly equipped with well-maintained tools and also enabled by work circumstances and incentives to do the job well.

Clandestine film shot by animal-welfare group Animal Aid between 2009 and 2018 has shown alleged or perceived abuse of animal welfare by abattoir staff at thirteen operations of different sizes and types, even when OVs were present at all sites.[1] It can be said that OVs perform a highly valuable role, not least in embodying an external gaze upon abattoir practice. But it is not clear that the regulatory insistence on their presence in all cases is worth its cost, whether paid by the operator or (in the case of smaller abattoirs receiving support funding) the taxpayer – particularly in small abattoirs, where there are very few ante-mortem rejections. Meanwhile, it is hoped that mandatory CCTV in all abattoirs will improve animal welfare, though it should be noted that this incurs extra costs harder borne by smaller abattoirs.

[1] It was subsequently noted by participants that, whilst activity and lobbying by Animal Aid and other groups has led to the mandating of CCTV in all abattoirs, the covert filming rarely ended up in prosecution of the individuals concerned.

Regulation

To preserve public health, abattoirs must fulfil stringent regulatory requirements which aim to ensure food safety of meat, animal welfare, and prevention of disease spread by cross-contamination between farms. The key regulations that abattoirs are subject to, and particularly the requirement for an official veterinarian to be present, stem from EU legislation. Any proposal to change these rules must take account of how that might affect the exportability into Europe of British meat.

The food business operator (FBO), who is responsible for ensuring meat is fit for human consumption, presents carcases to the OV who, on behalf of the Food Standards Agency, inspects to ensure that the meat has been produced in compliance with regulations and authorises the FBO to stamp the meat accordingly. Would (and could) FBOs take more responsibility for process if they carried sole responsibility for the stamp – meaning they would be obliged to ensure that all the necessary inspections were carried out to the required standards? Participants differed about the real value for money of OV presence and meat inspection for food safety in the UK and whether the inspection standards are appropriate for the comparatively low risks associated with red meat, but they agreed that consistent hygiene standards are necessary to protect all consumers and farmers.

The meat production industry must avoid damaging itself. A material mistake by one business brings serious repercussions upon all. If the consequences of flouting or abusing regulation are too mild, or are not properly prosecuted, abuses will continue. Therefore, perpetrators must be pursued and appropriate penalties – prison sentences, fines, revocation of certificates and licences, etc. – enforced. Participants would like to see the National Food Crimes Unit vigorously prosecute illegal slaughter, unlawful processing, fraud, misrepresentation or substitution of meat, etc.

Participants agreed that:

- Trying to stamp out rogue behaviour through increased regulation alone has the unintended effect for the law-abiding of stifling business.
- Bad outcomes can derive from inexperience or lack of common sense; OVs may benefit from mentoring or shadowing to increase their understanding of regulation in practice.
- Legacy bureaucracy, originally introduced for good reason (for example, around cleansing and disinfecting to prevent spread of foot-and-mouth), must be reviewed as soon as appropriate to minimise unnecessary regulatory burden.

Grant applications are seen as unduly onerous and restrictive for abattoirs, as are bureaucratic requirements for the same information about animals to be entered on multiple forms. Bureaucracy around inspections (for example) must be rigorous to maintain traceability. But rigour need not entail repetitiousness. Effective, streamlined regulation would be a boon, and technology should be able to help.

Tagging and chipping technologies offer the possibility of tracking individual animals in real time throughout the slaughter process. Holding animal information on a central database could considerably simplify paperwork and planning and enable bodies such

as the FSA to see into the food chain quicker, more clearly and in more detail. At the other end of the chain, DNA testing (already introduced by Marks & Spencer) promises soon to make meat fully traceable to origin in hours rather than days and weeks.

The regulation of small-scale poultry slaughter is very different from that of red-meat animals, allowing the slaughter of up to 10,000 birds under Local Authority monitoring without having to become an approved slaughterhouse subject to FSA inspections. Can this thinking be flipped into the red meat sector to allow for a greater number of low-throughput slaughtering operations on farms to be mandated by the Local Authority – e.g., six sheep, a beast, and three pigs? How could we make sure that lighter regulation for lower throughput achieves the same (or better) outcomes for hygiene and welfare standards as in higher throughput operations?

Practical constraints

The science and technologies of stunning and slaughtering animals inform abattoir regulation and practice, and continue to evolve. Red-meat animals must be stunned effectively and during unconsciousness sticking must be performed swiftly and completely so that death by blood loss is complete before consciousness can be regained. Mechanical and electrical stunning are both used in the UK on large animals. Electrical water-baths may be used on poultry. Gas killing, using carbon dioxide or a mixture of inert gases, may also be used on pigs and poultry. Each of these methods carries risks of mis-stun or mis-slaughter which cause distress and suffering to the animal.

The main constraints facing on-farm slaughter are not necessarily stunning and sticking so much as the expense, time and space needed for training, acquiring and maintaining equipment, large quantities of washing water (and means of disposing of it), proper hygienic facilities for handling blood (and gutting, skinning) after death, the collection and disposal of by-products in areas where there are no rendering facilities, high renderers' fees, OV fees (though these are subsidised for small premises), and paperwork.

Small and mobile abattoirs too are gravely challenged by these costs, by high time costs in handling paperwork and regulatory requirements, and losses of fifth-quarter income which are associated with an uncompetitive rendering market in the UK.

Operator income

Costs and income opportunities are perhaps the most important (or at least the most immediately felt) incentives which need to be aligned with desired outcomes for better animal welfare, hygiene, and traceability.

Costs of abattoir operation are rising along with increasing requirements for new equipment and training. Meanwhile, retailers and consumers always seek low prices, fifth-quarter income has fallen dramatically, and disposal costs are high owing to lack of competition in the rendering sector. There is no obvious solution to the problems created by these pressures upon abattoirs as businesses (although the opening of a new rendering facility in Lancashire may help). Grants for developing or building abattoirs are

difficult to obtain because they require a guarantee to provide employment or are simply unavailable in England. They are easier to obtain in Scotland.

The combination of high costs/time against lower income hits smaller, local abattoirs harder, because they do not enjoy the same economies of scale as larger operations. Where small abattoirs are located in-town, it may be very attractive to sell up and retire. The market will of course find its own way – but more loss of small abattoirs will push the meat industry in new directions which will be damaging to small meat producers and may not be in consumers' interests.

Even in large abattoirs, though, pausing a production line because of hygiene or welfare concerns may mean loss of income for staff who are paid for the number of animals slaughtered in a given period. Incentives here are misaligned.

Brexit may offer new opportunities for British export into markets demanding high-quality, high-welfare meat. Simultaneously, there is a high risk that cheap meat will enter the UK from abroad, threatening the market viability of British meat which has been produced to higher standards. One possibility is a layered system enforcing one set of regulations for meat intended for domestic consumption and another for meat to be exported. (In New Zealand, the domestic population's concern for animal welfare results in export meat being produced to higher standards than the market currently demands.)

Existing abattoirs can benefit through exploring new retail opportunities – direct sale, farm-shops, online – and by offering processing and other services to producers. The required butchering and business skills necessitate training and quite probably new hires who show a strong flair in the right areas. Retail is tough.

Other work which could and perhaps should be undertaken by smaller UK slaughterhouses includes the slaughter of a greater variety of end-of-life animals. This is a complicated issue owing to regulation and bureaucracy around the handling of unfit/casualty animals, different kinds of end-of-life (disease, minor injury, end-of-lay, cull, etc.), welfare issues (humane transport, competent slaughter), and disinclination by abattoir operators to become associated with the knacker's role. A clear line must be drawn between animals unfit for consumption and animals at the end of their useful production life. Where abattoirs find it possible to expand their role, it could boost available work for the abattoir, strengthen the abattoir's relationships with farmers, facilitate a quick, clean death and proper disposal of any specified risk materials from the carcase in approved premises, or, where animals are fit for food, decrease waste while potentially offering additional sources of income in the right market (e.g., aficionados of coq-au-vin would much prefer to buy tough, flavourful birds than roasting fowl which collapse when stewed).

Abattoirs and the food chain

Small and niche meat farmers depend on local abattoirs to slaughter their livestock and often also to butcher and pack it for sale locally or to retailers. Local slaughter is necessary for the designation of meat as being the product of a particular geographical area, which

is increasingly important for farmers relying on the premium they can charge for local, traceable meat from a short supply chain.

An abattoir nearby means lower transport costs for live animals and carcases. Livestock markets may allow small producers to send meat to slaughter otherwise, but do not allow for the designation of the meat as 'locally produced' – a significant added value for most small producers. Additionally, auction fees add significant costs (one figure quoted was 3.5%, of which 20% comprised rates payable by the auctioneer).

Farmers' own concern for the welfare of animals they have raised, their desire to supply a high quality of meat, and their possible need for special services such as return of selected offal, butchering, etc., mean that they may well desire a degree of control over the slaughtering process which is only possible at small abattoirs.

Local abattoirs are well placed to build confidence, trust, and strong relationships with both their livestock suppliers and downstream retailers or consumers.

Abattoirs and public perception

Retailers are very aware of public and media opinion about the food standards they are seen to support, and want happy pictures of animals to sell produce. Unfortunately, the happy pictures gloss over the fact that the majority of the British public do not know enough about the realities of slaughter and standards of food production in the UK to make an informed judgment about the quality of the meat they are buying and the implications for the food chain of their purchases.

Shouldn't the place, method and style of slaughter constitute part of the provenance of meat which consumers want to know about? But people avoid reminders of death. Parents, schools, restaurants, supermarkets and other purveyors of meat do not dwell upon the transformation of animals into food. Councils and public are not keen to have new abattoirs opening near them (NIMBYism).

This general avoidance of too much knowledge about meat production in the UK is particularly worrying for the profession's future. To attract new talent into the industry, the professionalism and craft of slaughter must be better understood and more widely promoted.

Children especially lack awareness of where meat comes from and how. More education is desirable about the whole food chain in which abattoirs are a vital link. Public and school visits to abattoirs are to be encouraged. Can we build abattoirs with glass walls, or stream live footage from slaughterhouse CCTVs?

When they do think about it, the meat-eating public like the idea of a food animal spending its whole life in one familiar environment with minimal disruption for death. Whether scientifically justified or not, and setting aside considerations about facilities and training, this emotional response would tend to put on-farm slaughter in first place as the most desirable method, followed by small, local abattoirs, followed by larger, 'industrial' operations.

Conclusions

Participants agreed that building new abattoirs is not the solution to the challenges facing the sector. What is needed is wholehearted support for the abattoirs we have, and a good understanding of what factors have contributed to recent successes or failures.

Current public perceptions and rules make it hard for abattoirs to find this support and they may need extra help with practicalities: rates, tax, planning and training. Regulation as it stands is oppressive to the virtuous and flouted by the vicious and the grant application process deters new abattoirs from starting up. Bureaucracy and paperwork could be streamlined through technological innovation. Operator income is threatened by rising costs, including lack of competition in the rendering sector. More generally, the British public do not understand the vital roles played by abattoirs and particularly small, local abattoirs in their food chain, and so this role and the professionalism of the industry need to be better communicated.

Actions

- *Review of the regulatory framework:*
  Norman Bagley, John Mettrick, William Lloyd Williams and Martin Morgan (Executive Secretary for the Scottish Association of Meat Wholesalers), with possible changes to be reported back to Martin Evans and Jason Feeney, CEO of the FSA.
- *Against food fraud:*
  No immediate action to be taken, because this problem should solve as DNA testing and new traceability systems fall into place.
- *Against lack of competition in the rendering sector:*
  No immediate action to be taken. We hope that new facilities will resolve the problem.
- *Survey the success and failure factors associated with the small abattoir sector:*
  John Mettrick to approach the Worshipful Company of Butchers about possible action.
- *Promote the professionalisation of the sector to make it more attractive to new entrants:*
  John Mettrick to connect the Craft Butchers Association with the Fiona Kendrick working group.
- *Lobby for food provenance on the school curriculum*:
  All to seize every opportunity to do so. (NB new educational programmes about food provenance are expected in 2019.)
- *Lobby on the issue of the small-abattoir sector being stifled by regulation*, including (in England and Wales) grant applications:
  All to seize every opportunity to do so.
- *Support to the farm gate for initiatives relating to innovation* (with a view to taking it downstream beyond the farm gate):
  Andrew Lazenby to take up.

Participants

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Mr Norman Bagley	Head of Policy Association of Independent Meat Suppliers
Mr Phil Brooke	Research and Education Manager, Compassion in World Farming
Mr Chris Dodds	Executive Secretary The Livestock Auctioneers Association Limited
Ms Jane Downes	Veterinarian Farm Animal Welfare Council
Mr Martin Evans	Head of Field Operations Food Standards Agency
Mr David Gardner	Independent Agriculturalist
The Reverend Dr Gordon Gatward, OBE	Retired
Mr Martin Gilder	Owner Martin's Meats
Mr Mike Gooding	Director Farmers First
Mr Peter Jinman	Veterinary Consultant PCJ Consulting/VCS Ltd
Professor Andrew Knight	Professor of Animal Welfare and Ethics University of Winchester Centre for Animal Welfare
Mr Andrew Lazenby	Chief Executive Innovation for Agriculture
Mr William Lloyd-Williams, MBE	Director of Policy National Craft Butchers
Mr Stephen Lomax	Legal & Veterinary Director and Adviser AIMS (The Association of Independent Meat Suppliers)
Mr David Main	Professor of Production Animal Health and Welfare Royal Agricultural University
Mr Chris Mallon	Chief Executive National Beef Association
Mr Charles Mason	Technical Director Humane Slaughter Association
Mr John Mettrick	President NCB (National Craft Butchers)

Dr Lutfi Radwan	Farmer and Educator Willowbrook Farm
Mrs Ruby Radwan	Farmer and Educator Willowbrook Farm
Dr Katharine Scarfe Beckett	Rapporteur
Mr Phil Stocker	Chief Executive National Sheep Association
Mr Mark Suthern	National Head of Agriculture Barclays
Mr John Thorley, OBE	Chairman Association of Independent Meat Suppliers now incorporating National Association of Catering Butchers
Ms Ruth Tudor	Farmer, Researcher & Psychotherapist
Mrs Helen Woolley	Director General Country Land and Business Association
Mr Steve Wotton, MBE	Associate of the University of Bristol Director of Steve Wotton Ltd
Mr Richard Young	Policy Director Sustainable Food Trust

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