

06/03/2020

Revision of the Guidance for the Home Slaughter of Livestock in England and Wales

Summary report of stakeholders responses

The Revision of the Guidance for the Home Slaughter of Livestock in England and Wales consultation was issued on the 5th August 2019 and closed on 31st October 2019. The Guidance 'Home Slaughter of Livestock – A guide to

the law in England and Wales' has been updated, primarily to reflect the changes to the animal welfare rules in Council Regulation (EC) 1099/2009 on the protection of animals at the time of killing, allowing the slaughter of animals to be undertaken by a competent person on behalf of the owner on the owner's property, for private domestic consumption.

- 1 The FSA is grateful to those stakeholders who responded and sets out in the table below responses in order of the issues considered.
- 2 The key proposals on which the consultation sought views were:
 - The guidance provides sufficient information to aid compliance with the law?
 - Best practice advice in the guidance is clearly identified?.
 - The guidance is clear and easy to follow?
 - Our assessment of the impact of the updates is sufficient?
- 3 The Food Standards Agency's considered responses to stakeholders' comments are given in the last column of the table. A summary of changes to be made to the original revised guidance resulting from stakeholder comments is set out in the final table.

Summary of substantive comments to the FSA consultation – the revision of the guidance for the home slaughter of livestock in England and Wales

Issue: The guidance provides sufficient information to aid compliance with the law?

Respondent	Comment	Response
Farmers' Union of Wales (FUW)	Members generally agreed that the language of the revised guidance was relatively clear and easily understood. The examples section on page 11 was particularly useful as was the 'useful contacts' section.	Comment noted.
All Wales Food Safety Expert Panel	<p>The All Wales Food Safety Expert Panel reports to and provides specialist advice on food safety matters to Welsh Heads of Environmental Health. Welsh Heads of Environmental Health is the collective organisation of the most senior Environmental Health professionals from all 22 Welsh local authorities. Generally the guidance provides sufficient information to aid compliance with the law and is clear and easy to follow.</p> <p>The guidance would benefit from a link to enable a search for Trading Standards departments to be carried out as these are generally the departments which are responsible for enforcing Animal Welfare and TSE legislation. The website only currently provides a search facility for food safety departments.</p> <p>It would be beneficial to provide advice in the guidance on how verification of a slaughter man's certificate of competence or WATOK licence can be obtained.</p> <p>It would be useful to include in the document information for livestock owners on how they can obtain the locations of approved slaughterhouses.</p>	<p>Comment noted. We will update the guidance to include a link to Trading Standards Departments.</p> <p>Comment noted. We will update the guidance to include advice on how verification of a slaughterman's Certificate of Competence or WATOK licence can be obtained.</p> <p>Comment noted. We will update the guidance to include a link to approved slaughterhouses.</p>

<p>NFU Cymru</p>	<p>Yes we would say it does in the main. However where you use links to other websites we ask that these need to be more specific. Current links take you to a front page and not directly to the section that is relevant to the question being asked. An example would be keeping farm animals' link on page 5.</p>	<p>Comment noted. We will review the links in the guidance and make them more specific where we can.</p>
<p>NFU</p>	<p>The NFU represents 55,000 members in England and Wales, involved in 46,000 farming businesses. In addition, we have 55,000 countryside members with an interest in farming and the countryside.</p> <p>The NFU believe the information provided on the guidelines of the law are suitable to help people comply with the law. The EU TSE regulations have detailed to outline the rules around what age cattle need testing, how to organise testing and how SRM is disposed of.</p> <p>We believe the question and answer brief in the guidance is a good way of answering farmers and keepers questions. Most questions give a clear answer and cover the information required, we believe it would be helpful to have a Q&A on casualty slaughter on the farm with advice on the best practise guidance around this and situations where it might be applicable. We would also like some additional clarity around question 11, "<i>can I have an animal privately slaughtered other than in an approved slaughterhouse?</i>" The second point of the response states "<i>under an exemption which allows you to slaughter on your holding small quantities of poultry or lagomorphs reared there and place them on the market for human consumption, subject to certain conditions</i>". There is then a footnote linking to a website however, the link does not directly take you to the exemption mentioned which would be preferable to avoid confusion.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. We will review the guidance and make amendments to address these issues and improve clarity.</p> <p>Comment noted. We will review the guidance and make any necessary amendments to cover this.</p>

<p>Chartered Institute of Environmental Health (CIEH)</p>	<p>The CIEH is the professional voice for environmental health representing some 8,000 members working in the public, private and non-profit sectors. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.</p> <p>Generally, the guidance provides sufficient information to aid compliance with the law. However, the inclusion of the following information would further aid compliance:</p> <ul style="list-style-type: none"> • In paragraph 15 it states that 'SRM must be disposed of in an approved category 1 rendering or incineration plant'. It would be useful at this point to provide readers with a link to approved animal by product disposal sites (including SRM) or refer them to the link in Annex A. • At paragraph 30 it would be beneficial to provide advice to livestock owners and enforcement officers on how they can verify that a slaughter man holds a certificate of competence or WATOK licence. • Whilst it is acknowledged that the guidance relates to home slaughter, there are several references in the document to approved slaughterhouses. It would be useful to include in the document information for livestock owners on how they can find out the locations of approved slaughterhouses. • The link in the document to Local authorities is to food safety teams. As TSE regulations are enforced by Trading Standards, a suitable link should be provided to Trading Standards services. • It would be useful if the guidance could provide Local Authorities with an indication of the nature and frequency of monitoring/verification activities that would be considered appropriate. 	<p>Comment noted.</p> <ul style="list-style-type: none"> • Comment noted. We will review the guidance and make any necessary amendments to cover this. • Comment noted. We will review the guidance and include some advice on this. • Comment noted. We will update the guidance to include a link to approved slaughterhouses. • Comment noted. We will update the guidance to include a link to Trading Standards Departments. • It is the responsibility of the Local Authorities (LAs) to determine what level of monitoring they carry out to ensure activities are compliant. By providing voluntary notification of home slaughter, LAs will have better intelligence of where such operations are carried out which will inform a risk based approach to target resources towards unlawful slaughter and any resulting unsafe meat placed on the market.
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ISSUE: Best practice advice in the guidance is clearly identified?

Respondent	Comment	Response
Farmers' Union of Wales (FUW)	Members stated that, in the event of an emergency slaughter, particularly at a weekend, it may not be possible to notify the Local Authority in advance of the home slaughter. Consequently members believed that the 5 days given to notify the Local Authority after the event was reasonable and pragmatic.	Comment noted. For clarity, there are provisions for emergency slaughter that allow the slaughter of animals at the farm in the event of an accident under set conditions and the dressing of the animal at a slaughterhouse that may allow its meat to be placed on the market. It is understood this comment does not refer to those, but to circumstances when the farmer may choose to slaughter such animals at the farm for own consumption. The FSA notes that the provision in the guidance to allow up to 5 days notification to LAs when this cannot be made in advance is reasonable and pragmatic.
All Wales Food Safety Expert Panel	It is anticipated that not all farmers will follow best practice and provide advance notification of home slaughter. It is likely that intelligence on unlawful home slaughter or presumed to be unlawful home slaughter would increase. This could result in further pressures on the resources Local Authorities have in relation to competent staff and investigation time. It is not stated what monitoring/verification activities would be considered appropriate for LAs to undertake to ensure activities fall within the scope of the guidance.	Comment noted. On farm slaughter for own consumption is currently allowed and has been so for a number of years. FSA believes that revising the guidance will not lead to a significant increase in the number of home slaughtered animals. By providing voluntary notification of home slaughter LAs will have better intelligence of where such operations are carried out which will inform a risk based approach to target resources towards unlawful slaughter and any resulting unsafe meat placed on the market. It is the responsibility of the LA to determine what level of monitoring they carry out to ensure activities are compliant.

NFU Cymru	Yes the shaded grey boxes are useful in distinguishing between legislation and best practice. One point we would however make is notification to the Local Authority where you say advance notice if possible yet at the same time you say notification within 5 days of the slaughter. It does not make it clear if either or neither are legislative requirements.	The FSA propose the notification to the LA to be voluntary, whenever possible in advance and if not possible then within 5 days of slaughter. The voluntary reporting, which the FSA will review in 12 months' time, will alert the LA to the number of animals slaughtered on farm and any possible evidence or suspicions of illegal placing of meat from a home slaughtered animal on the market will be fully investigated.
NFU	Best practice guidance is clearly outlined in the format of a grey box with the title best practice therefore drawing its attention to users. The best practice guidance boxes are found on page 12 and 16 and give information about informing your Local Authority about home slaughter. When following the link to the website it firstly asks if you are a consumer or business, then when following business and looking under business services there is no specific option for reporting home slaughter. It would be nice to see a clearer option or for the guidance to inform the user what to search for to inform the correct people. No other best practice guidance is given.	Comment noted. We will update the guidance to make this clearer.
Chartered Institute of Environmental Health (CIEH)	The guidance clearly differentiates between legal requirements and best practice with best practice clearly highlighted in the document.	Comment noted.

ISSUE : The guidance is clear and easy to follow?

Respondent	Comment	Response
<p>NFU Cymru</p>	<p>Yes in the main it is and we particularly welcome the Question and Answer Brief. Perhaps more focus needs to be placed on the correct disposal of SRM within the body of the document rather than as an Annex right at the end which could be missed.</p> <p>We also think there needs to be more distinction and clarity on the roles of FSA, APHA and Local Authorities in the process and where the line of duty splits lie between them. It would also be useful to have a specific point of contact at FSA and APHA. In the case of Local Authorities this we realise would be more difficult due to the numbers involved but it would be expedient for them to have a specific point of contact when Livestock producers phone in with queries or notifications of slaughter.</p>	<p>Comment noted. We will review the guidance and make any necessary amendments to clarify this.</p> <p>Comment noted. We will review the guidance and make any necessary amendments where we can to clarify this.</p>
<p>NFU</p>	<p>There are a few places in which we believe the language used or wording could be improved to give clarity for those following:</p> <ul style="list-style-type: none"> • Point 4 mentioned reporting the home slaughter to the appropriate agencies in the usual way, this could be clarified by mentioning British cattle movement service (BCMS), animal reporting and movement service (ARAMS). • Point 27 of the guidance references a leaflet from the Humane Slaughter Association but having visited their website there means to be several publications, to make the best practice guidance as useful as possible for users could the specific link be provided or the number of the relevant technical note. 	<p>Comment noted.</p> <ul style="list-style-type: none"> • Comment noted. We will review the guidance and make any necessary amendments to clarify this point. • Comment noted. We will review the guidance and provide a more direct link for clarification.

Chartered Institute of Environmental Health (CIEH)	Generally, the guidance provides clear, easy to follow information for Local Authority enforcement officers, livestock owners and licensed slaughter men. The document could be further enhanced by including the titles of the annexes on the contents page as below: Annex A Useful Contacts Annex B Questions & Answers Annex C Definition of Specified Risk Materials	Comment noted. We will review the guidance and make any necessary amendments to include this.
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ISSUE: Our assessment of the impact of the updates is sufficient?

Respondent	Comment	Response
All Wales Food Safety Expert Panel	The guidance clearly indicates that Local authorities are responsible for the enforcement of Animal Welfare and domestic Food Hygiene and TSE Regs. There will be additional LA resources required to monitor and verify that notified home slaughter activity is being carried out within the scope of the guidance which haven't been considered within the consultation. If monitoring and verification activities are not carried out then there is a high risk of unlawful activity taking place i.e. meat being passed on to persons or businesses outside the scope of the guidance.	Comment noted. The FSA recognises the possibility that animals may be slaughtered and their meat be sold unlawfully and this can happen regardless of whether the guidance is updated. The provision that farmers intending to slaughter animals on the farm for their own consumption notify their LA is aimed at identifying where these operations are lawfully carried out. The FSA accepts that verification controls require resources but by providing notification of when this is happening would help target suspect illegal slaughter operations. LAs will investigate possible evidence of illegal placing of meat from a home slaughtered animal on the market and where appropriate, enforcement action will be undertaken.
NFU Cymru	Yes	Comment noted.

<p>NFU</p>	<p>The NFU agree with the assessment that familiarisation time of the updated guidance would be low effort for keepers or licensed slaughter men. If the links added could be made clearer as mentioned in the points above the time taken would then be reduced again.</p>	<p>Comment noted.</p>
<p>Chartered Institute of Environmental Health (CIEH)</p>	<p>The guidance clearly indicates that Local Authorities are responsible for the enforcement of Animal Welfare and the domestic Food Hygiene and Transmissible Spongiform Encephalopathies (TSE) Regulations on farm. The resources required to monitor and verify that notified home slaughter activity is being carried out in accordance with the guidance have not been considered. If monitoring and verification activities are not carried out, there is a high risk of unlawful activity taking place i.e. meat being supplied beyond immediate family who share the household or being removed to another premises for processing.</p>	<p>Comment noted. The FSA recognises the possibility that animals may be slaughtered and their meat be sold unlawfully and this can happen regardless of whether the guidance is updated. The provision that farmers intending to slaughter animals on the farm for their own consumption notify their LA is aimed at identifying where these operations are lawfully carried out. The FSA accepts that verification controls require resources but by providing notification of when this is happening would help target suspect illegal slaughter operations. LAs will investigate possible evidence of illegal placing of meat from a home slaughtered animal on the market and where appropriate, enforcement action will be undertaken.</p>

OTHER COMMENTS:

<p>Respondent</p>	<p>Comment</p>	<p>Response</p>
<p>Private individual</p>	<p>After reading your proposal I still find that this law will be broken by regular people and not farmers and qualified slaughterers. The welfare of the animals concerned and the barbaric methods of slaughter are not covered enough. I could hack a sheep to death in my garden as long as I consume the meat yet that would be fine?</p>	<p>Comment noted. The guidance sets out the Animal Welfare legislation to protect the welfare of livestock animals when they are killed and which also applies to on farm slaughter. Under these regulations, the home killing of an animal and any related operations shall only be carried out by persons with the appropriate level of competence to do so without causing the animals any pain, distress or suffering. Any evidence of illegal slaughtering will be investigated and where appropriate, enforcement action will be taken.</p>

<p>Boniface Veterinary Practice</p>	<p>I am a big fan of home slaughter having worked in New Zealand and experienced it first hand. It is the best welfare for the animal who has no understanding of the gun approaching its head whilst it stands in its field or yard. I have moved up to Devon and we have abattoirs here which will take emergency slaughter cases which clearly is good welfare whilst still allowing these animals into the food chain. However, after mid-day on Fridays or weekends this isn't an option and these animals go to the knackerman which is a real waste as often the farmer wants them back for his freezer anyway. It was demoralising in Cornwall that there weren't any local abattoirs making this unfeasible. Clearly there are also times when a farmer would just like a beast for his freezer and so homeslaughter would be ideal.</p> <p>I did wonder why a vet could not slaughter the animal in the event of the Friday night type scenario where the farmer may not have the means. In the first instance we will be unlikely to have a service provided outside of the slaughterhouses by licensed slaughtermen so I think would be needed.</p> <p>Some guidance on sending dyed SRM to the local knackerman would be useful as I assume that this will be the best route for this.</p>	<p>Comment noted. 'Home slaughter' is distinct from 'private slaughter' which is when the owner of the animal sends it to an approved slaughterhouse to be slaughtered and the dressed carcass is returned to the owner. The FSA advises that animals be slaughtered at an approved slaughterhouse where hygienic facilities exist and meat can be subjected to formal inspection procedures.</p> <p>Comment noted. There are currently no proposals to extend permission for home slaughter beyond holders of Certificates of Competence or licensed slaughtermen. However, a Vet can slaughter an animal in the pursuance of their professional duties therefore, a weekend on farm casualty could be slaughtered (stunned and bled) by the Vet but the Vet must not carry out any further action.</p> <p>Comment noted. Annex C of the guidance specifies the staining requirements for SRM and a link to approved Animal by-products disposal sites (including SRM) is included in the contacts list at Annex A. The disposal of animal by-products via non-authorised establishments is not permitted. We will update the guidance to include the list to approved APB disposal sites in other relevant parts of the document.</p>
<p>NFU Cymru</p>	<p>NFU Cymru represents producers of Livestock in Wales and welcomes the opportunity to comment on this Guidance. Food safety and animal welfare is paramount to us and we note the issue of this guidance as a one stop reference document.</p>	<p>Comment noted.</p>

<p>Farmers' Union of Wales (FUW)</p>	<p>The FUW is acutely concerned that resources better deployed elsewhere have gone in to the production and consideration of this formal consultation at a time when Brexit and the possibility of the UK exiting the EU without a trade deal demands significant focus; not least for those involved in the food supply chain and its regulation. Given that this issue was subject to initial consultation in 2013, the timing of the present consultation could have been much better placed. Moreover, given the consultation appears to relate to 'revised guidance' on compliance with Council Regulation (EC) 1099/2009, some members stated that the necessity and/or timing of the consultation raises questions regarding the FSA's appreciation of what is currently facing the country.</p> <p>Whilst Members fully support the right of a farmer to kill their own animals for private use, or have those animals killed, members highlighted the need to ensure that such a right is not abused in a way which undermines small and local slaughterhouses. Moreover, the degree to which restrictions, regulations and charges implemented and levied by the FSA have reduced the viability of small and local slaughterhouses, thereby undermining local supply chains, was highlighted by members. Indeed, members commented that the huge pressures felt by such businesses did not in any way reflect the rhetoric of politicians and governments about the importance of locally produced food, distances to slaughter, food miles and the like.</p>	<p>Comment noted. We appreciate the concerns raised over prioritisation of resources.</p> <p>We recognise the impact EU Exit preparations are having on key stakeholders such as FUW and we appreciate that during this period you have taken time and effort to provide a response from your members.</p> <p>We are conscious about the need to balance 'business as usual work' and ongoing preparations for EU Exit. The FSA is leading on and is fully engaged with these preparations however, the FSA will continue to prioritise stakeholder consultation during this period where actions are needed to ensure continued regulatory compliance and the maintenance of food safety where human health and animal welfare is paramount.</p> <p>Comment noted.</p>
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<p>All Wales Food Safety Expert Panel</p>	<p>As a general public health comment there could be an increased risk of the farmer and immediate family contracting TB as the meat would not be subject to inspection prior to being consumed by family members.</p>	<p>Comment noted. The guidance already makes clear that home slaughter is likely to carry a greater human health risk than slaughter that takes place in approved premises where meat can be subjected to formal inspection procedures to verify that it is fit for human consumption. We will review the guidance to ensure that this is emphasised and made more prominent. Research indicates that the risk to human health from eating meat from TB reactors is very low. Any undetected bacterium that causes TB will be killed by thoroughly cooking the meat.</p>
<p>The UK Centre for Animal Law (A-Law)</p>	<p>The UK Centre for Animal Law (A-Law) exists to promote knowledge and education about the law relating to animal protection, and the more effective enforcement of legislation relating to animals.</p> <p>There is a dearth of guidance in relation to the home slaughter of invertebrate animals, reptiles and amphibians notwithstanding the fact that people have a legal duty not to cause avoidable pain, distress or suffering and are required to have the necessary knowledge and skill necessary to kill the animals humanely.</p> <p>In relation to the slaughter of animals for home consumption the Government has issued 'Slaughter poultry, livestock and rabbits for home consumption' which specifically refers to the need to stun these animals before killing.</p> <p>The current Food Standards Agency (FSA) guidance 'Home slaughter of livestock: A guide to the law in England and Wales' (2013) is relevant to land animals, rather than fish or invertebrates. There is no equivalent document relating to invertebrates or fish and the detailed recommendations that apply to land animals are not useful to anyone who purchases animals such as lobsters and crabs live for home slaughter and consumption.</p>	<p>Comments noted – As detailed in the revised guidance, this guide is not intended to cover all livestock species, but it does cover those species for which we receive most enquiries. It is particularly applicable to cattle, sheep and goats where TSE controls apply.</p> <p>The FSA understands your concerns and with regards to the lack of guidance relating to the humane slaughter methods for fish, and invertebrates such as crabs and lobsters that are commonly killed by owners for home consumption. This has been referred to Defra who are responsible for that policy area and they have responded as follows</p>

	<p>We respectfully request that this lacuna is addressed in the revised guidance and that consumers are directed to the best guidance currently available about humane slaughter methods for fish, and invertebrates such as crabs and lobsters that are commonly killed by owners for home consumption.</p>	<p>'Thank you for your email of 28 October about humane slaughter methods for fish and invertebrates. Decisions on future animal welfare policy will be a matter for any incoming Government to decide upon. Officials have been made aware of the points in your email, and such issues will be considered as part of future policy development.'</p>
<p>The National Craft Butchers</p>	<p>The National Craft Butchers, formerly the National Federation of Meat and Food Traders, founded in 1888, represents the interests of thousands of independent craft butchers, farm shops and small abattoirs across England and Wales. Some butchers operate their own small slaughterhouses and many of the remainder source supplies from other local small and medium operators.</p> <p>We have received many calls from members on this subject and we have canvassed opinion directly from slaughtering operators. We are therefore confident that our views represent the firm and united opinion of independent meat suppliers in England and Wales.</p> <p>We are strongly opposed to this relaxation on home slaughter. It compromises public health, animal welfare and risks the reputation of the meat industry and regulators alike.</p> <p>“Revision of Guidance for Clarity” This is not a revision but a fundamental about-turn in interpretation. Contrary to the consultation document there is no clarity or explanation on why the Agency has taken this action. It is in effect new regulation or GOLD PLATING. As such it should be closely scrutinised by the FSA legal team, the Board and possibly ministers. We are amazed that the FSA are even considering this relaxation and retrograde step given that there is clearly an increased risk to public health. The proposed measure is at odds with the usual FSA tolerance to food safety risks.</p>	<p>Comment noted.</p> <p>Comments noted. The FSA advises that the revised guidance is not a relaxation but a clarification of the legislation that permits the owner of an animal to employ a competent person to carry out slaughter. The current guidance on the FSA website which is dated 10 May 2013 does not reflect the changes to the Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing, which permits slaughter for private domestic consumption outside a slaughterhouse to be carried out by a competent person under the responsibility and supervision of the owner. It is a domestic requirement that such a person would require a certificate of competence.</p>

	<p>It is not clear why the FSA has completely overturned previous guidance that has been in place for many years. There has been no change in the law and there is no explanation in the consultation documents.</p> <p>We are aware of the ambiguous wording in the Animal Welfare Regulation 1099/2009, but this regulation does not, and cannot, over-rule long-standing prior regulations on hygiene and TSE's</p> <p>Slaughter on a farm or small holding is always likely to carry a greater public health risk than slaughter in approved premises because.No official veterinary ante and post-mortem inspection</p> <ul style="list-style-type: none"> • No supervision of hygiene requirements • No supervision of TSE controls • Increased possibility of faecal contamination • Cross contamination from farm equipment and chemicals etc. • No residue testing or surveillance • No check on ear tags, FCI etc. • No check on disposal of SRM, guts, blood and other animal waste. • Environmental risks from by-products • Skill levels of participants not guaranteed and likely to be much lower than in approved premises. • No back up if things go wrong. • Lack of adequate equipment • Difficulty of maintaining equipment hygienically. • No check or supervision by other authorities • Increased likelihood of diversion into the black market 	<p>Comment noted. The guidance reiterates that TSE Regulations apply wherever a TSE susceptible animal is slaughtered, and this includes home slaughter.</p> <p>Comment noted. Home slaughter is exempt from the requirements of the hygiene legislation and cannot be subject to the controls that exist in approved slaughterhouses. The guidance advises that home slaughter is likely to carry a greater human health risk than slaughter that takes place in approved premises where meat can be subjected to formal inspection procedures to verify that it is fit for human consumption.We will review the guidance to ensure that this is emphasised and made more prominent.</p>
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	<ul style="list-style-type: none"> • Detection of black-market/illegal slaughter crimes more difficult • Increased health and safety risks to farmer, slaughterman and anyone else in area <p>However unintentional there is clearly an increased risk of causing unnecessary suffering, pain or cruelty. This will be totally unmonitored and therefore unknown.</p> <p>Are DEFRA/Ministers aware that the CCTV requirement for animal slaughter will not be in force for on-farm kills? The regulations require that animals are spared any avoidable pain, distress or suffering. This can only be guaranteed in the controlled situation of an approved slaughterhouse.</p> <p>There is little doubt that in most cases of on-farm slaughter animals will inevitably suffer and be distressed. This is avoidable if the Agency were to keep their current interpretation unchanged.</p> <p>Disease control is very strongly diminished with possible disastrous consequences.</p> <p>Our view, based on conversations with operators, is that the take-up of home slaughter will be far greater than the FSA envisages. One member has already experienced a smallholder (10 to 15 animals a year) boasting that "we soon won't need you anymore". Slaughtermen who wish to carry out this work are not going to find it economic to just do one or two animals per farm visit and this will encourage escalation and neighbouring farmers getting together.</p> <p>The culture change and lack of policing will also lead, unfortunately, to further growth in the illegal black market.</p>	<p>Comments noted. The guidance specifies that under the Animal Welfare Regulations when animals are home slaughtered they must be spared any avoidable pain, distress or suffering during the process. The animals may only be killed after stunning in accordance with the methods and specific requirements laid down in Annex I of Council Regulations (EC) No 1099/2009 and WATOK. By giving the farmer the option to use the services of a licensed slaughterman, experienced in the slaughter of animals, this will lead to improved welfare conditions at the time of slaughter. The legislation in respect of the mandatory use of CCTV was passed through Parliament in February 2018 and came into effect from May 2018 but currently only applies in slaughterhouses in England</p> <p>Comment noted.</p> <p>Comments noted. On farm slaughter for own consumption is currently allowed and has been so for a number of years. FSA believes that the revised guidance will not lead to an increase in the number of animals slaughtered on farm for home consumption. As meat from home slaughtered animals may only be consumed by the owner of the animal (and the owner's immediate family), this will limit the number of animals that are home slaughtered. By providing voluntary notification of home slaughter, LAs will have better intelligence of where such operations are carried out which will help target resources at potentially unlawful slaughter with the intent of placing the meat in the market.</p>
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	<p>When we reminded members that the meat from home slaughter could not be supplied outside of the farmers household we were told, in no uncertain terms, that we must be living in cloud cuckoo land if we believed that. Their message to the FSA was: "You don't know what you're doing!"</p> <p>There will be many financial impacts emanating from the proposal:</p> <ul style="list-style-type: none"> • Reductions in levy payments resulting in less support for the meat and livestock industry in general. • Payment to slaughtermen likely to be in cash or bartered goods (meat) and therefore a reduction in monies to the Exchequer- both income tax and VAT • All small, and many medium sized, abattoirs will experience a reduction in reliable additional income from lost private kills. Given the high cost and necessary investment to maintain approval standards, and the known very low profit margins in the industry, it is possible that this loss of income will tip some over the edge. • These losses are likely to increase over time, creating a cumulative effect. • Increases in some Local Authority costs whilst others will simply ignore the issue, especially as notification by the owner is "voluntary". • The benefit to livestock owners is minimal but the financial impact on already struggling small abattoirs will be severe 	<p>LAs will investigate possible evidence of illegal placing of meat from home slaughtered animals on the market and where appropriate, enforcement action will be undertaken.</p> <p>Comment noted.</p> <p>Comment noted</p> <p>Comment noted</p> <p>Comment noted</p> <p>Comment noted</p> <p>Comment noted</p> <p>Comment noted.</p>
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	<p>We sympathise with livestock owners wishing to eat their own animals, but the world has changed. The rest of humanity, for wider public health & animal welfare reasons, can only consume meat that has been health-marked. Why should livestock owners be any different?</p> <p>It is a well-known fact that a great many owners already use meat to pay small suppliers, or for land rental, or gifts to family and friends, or staff bonuses, or small sale local marketing. Your proposals will escalate this situation and will inevitably include non-health marked meat. This practise is already impossible to police and your proposals will only make matters worse.</p> <p>The few illegal slaughtering crimes that are detected are often discovered on farms. We do not believe that convictions will still be possible under the new proposals because the individuals concerned will now be handed a defence that he was only stocking up for himself and his family. This will inevitably lead to Local Authorities or the Food Crime Unit not bothering to carry out such investigations in future which will, in turn, increase black market activity.</p> <p>Small slaughterhouse operators consider that it is intolerable that the Agency has brought forward these proposals.</p> <p>In the name of food safety and animal welfare abattoir owners must constantly reinvest into their businesses in order to remain compliant with regulations. Recent new expenses have included CCTV, Lairage and restraint improvements and upgraded stunning equipment. In addition, they suffer from continuous oversight, onerous inspection, bureaucracy and petty-minded officialdom.</p>	<p>Comment noted</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted</p> <p>Comment noted</p>
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	<p>If the Agency is adamant that this new interpretation will be imposed there should more stringent checks and controls introduced to ensure a more level playing field.</p> <p>Measures could include:</p> <ul style="list-style-type: none"> ◦ A registration system for farmers who wish to home kill ◦ Notification of facilities and equipment ◦ Acceptance that LA's may do spot-checks ◦ Number of animals in each kill ◦ Details of slaughterman for each kill ◦ Record keeping of all kills including eartag numbers, traceability etc ◦ Log all ABP and waste disposals ◦ Introduction of random audit checks by LA and/or local OV's/MI <p>We urge the Food Standards Agency to reconsider this review/change of policy</p>	<p>Comment noted</p> <p>Comments noted.</p> <p>Comment noted.</p>
<p>NFU</p>	<p>The NFU Represents 55,000 members in England and Wales, involved in 46,000 farming businesses. In addition, we have 55,000 countryside members with an interest in farming and the countryside.</p> <p>The NFU welcomes the chance to respond to the changes to update the guidance for home slaughter in England and Wales so that it now reflects the changes to the animal welfare regulations 1099/2009 (which was subject to a public consultation September 2013). Home slaughter is an important process on livestock farms within the UK as it provides an opportunity for livestock owners to slaughter for their own consumption, this can be a vital tool in some emergency casualty cases.</p>	<p>Comment noted.</p>

<p>Mid Devon District Council</p>	<p>In relation to the consultation update, dated 5 August 2019, on the revision of guidance for Home Slaughter of Livestock in England and Wales, Mid Devon District Council make the following comments:</p> <ol style="list-style-type: none"> 1. In 2017 Mid Devon District Council prosecuted an itinerant slaughterman for operating an illegal slaughterhouse. Hundreds of farmers used the illegal slaughterhouse that involved killing 4000 farm animals over a 5 year period. See http://www.ehn-online.com/news/article.aspx?id=16285 <p>In addition to operating an illegal slaughterhouse the itinerant slaughterman also visited individual farms killing and dressing animals. Notebooks seized at the time show the number of animals killed per customer ranges between 1 to 20. Where there are a number of animals being killed for an individual customer, this suggests onward supply rather than being used for the customer's own consumption. Some of those identified as having animals killed have been identified as operating as a registered food businesses including those who supply fresh meat at farmers markets. I also received anecdotal evidence that farmers passed this meat to friends and local pubs.</p> <p>The respondent detailed the cost to kill and/or cut the animals which significantly undercuts the cost of going to an abattoir (not including mileage costs and time) therefore driving the demand.</p> <p>The concern would therefore be that a revision to the guidance would create the conditions that would allow farmers to have multiple animals legally killed and butchered on farm, some of which will inevitably end up in the food chain.</p>	<p>Comment noted. It is illegal to run an unapproved slaughterhouse and any evidence of such operations will be fully investigated and appropriate enforcement action undertaken.</p> <p>Comment noted. Anyone running a food business needs to be registered with the LA and must have records of the source of the meat that they are selling (which must ultimately be from animals slaughtered at approved establishments). It is illegal to place meat derived from a home slaughtered animal on the market. Such meat is strictly for the consumption of the owner and that of members of his family. LAs will investigate possible evidence of illegal placing of meat from home slaughtered animal on the market and where appropriate, enforcement action will be undertaken.</p> <p>Comment noted.</p> <p>Comment noted.</p>
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	<p>2. In view of the limited market that home slaughtered animals can be supplied to i.e. the immediate family, an itinerant slaughterman should be limited to killing a limited number of animals at a given period of time.</p> <p>3. The guidance makes no reference to any controls or limitations that apply to an itinerant slaughterman i.e. traceability requirements, requirement to keep records, and who are the competent enforcement agency e.g. Environmental Health or Trading Standards (Trading Standards enforce animal welfare and animal by-products legislation).</p> <p>4. As the slaughterman would be supplying goods (dressed or undressed carcase) in the course of their business should they also not be registered as a food business by a Local Authority (or alternatively approved by the FSA) and comply with the traceability requirements of Regulation 178/2002 (similar to the wild game guide para 17).</p> <p>5. Ref: point 4, My experience is that not all farmers operate within the confines of the law. If farmers were to have numerous animals killed, some of which for onward supply, they are unlikely to record all killings in farm registers. During our investigation we were unable to trace all animal movement records/register despite having the details of farmers.</p>	<p>Comment noted. This cannot currently be enforced. However, the voluntary reporting to the Local Authority, which the FSA will review in 12 months' time, will alert them to the number of animals slaughtered on farm and any possible evidence or suspicions of illegal placing of meat from a home slaughtered animal on the market will be fully investigated.</p> <p>Comment noted. The home slaughter of livestock by the owner with or without the services of a licensed slaughterman is exempt from the Hygiene regulations and is a legitimate activity provided certain conditions are met</p> <p>Comment noted. Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing, permits slaughter for private domestic consumption outside a slaughterhouse to be carried out by a competent person under the responsibility and supervision of the owner. The FSA maintains a register of licensed slaughtermen and considers that provided the carcasses or parts of carcasses from home slaughter livestock other than those being disposed of as animal by- products are not removed to another premises for processing there is no requirement for the slaughterman to be registered as a food business.</p> <p>Comment noted. It is a legal requirement that all livestock owners maintain appropriate records of identification and movements of their animals. This includes ensuring that the home slaughter (deaths) of cattle, sheep, goats, pigs and deer are recorded in farm registers and reported to the appropriate agency. Where it is found that appropriate records have not been kept, enforcement action will be taken as necessary.</p>
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	<p>6. Ref: Best Practice highlighted top of page 12, what is the Local Authority expected to do on advance notification of any home slaughter?</p>	<p>Advance notification will enable the LA to provide advice on home slaughter where necessary. The need to inform the LA of intention to carry out home slaughter will also provide the relevant enforcement Authority with the information on where this activity is taking place should concerns be raised about slaughter on farm. Any possible evidence or suspicions of illegal placing of meat from a home slaughtered animal on the market will be fully investigated.</p>
<p>Chartered Institute of Environmental Health (CIEH)</p>	<p>The CIEH is grateful for the opportunity to comment on the updated guidance 'Home Slaughter of Livestock – A guide to the law in England and Wales'. The CIEH has members working across the UK to ensure food is safe and what it says it is. They work in the public, private and third sectors, delivering official controls, training food handlers and advising food businesses of their legal obligations. They all work with a common purpose – keeping consumers safe.</p> <ul style="list-style-type: none"> • Our members have identified the need to raise awareness of the requirement for a WATOK Certificate of Competence amongst seasonal on farm poultry producers. • As a general public health comment, home slaughter poses an increased risk to farmers and their immediate families of contracting TB as the meat will not be subject to the same level of inspection as that from approved slaughterhouses. 	<p>Comment noted</p> <p>Comment noted.</p> <p>Comment noted. The guidance already makes clear that home slaughter is likely to carry a greater human health risk than slaughter that takes place in approved premises where meat can be subjected to formal inspection procedures to verify that it is fit for human consumption. We will review the guidance to ensure that this is emphasised and made more prominent. However, research carried out indicates that the risk to human health of eating meat from TB reactors is very low. Any undetected bacterium that causes TB will be killed by thoroughly cooking the meat.</p>

	<ul style="list-style-type: none"> • There appears to be no justification for a review of the guidance in July 2020. Unless there is a change in the landscape e.g. legislative change, review 12 months following publication of the guidance would seem appropriate and consistent with the approach taken to reviewing other documents. <p>In conclusion the CIEH welcomes the revised guidance for livestock owners and regulators on the law relating to home slaughter. We have made some suggestions for amendment and observations which we trust the FSA will consider.</p>	<p>Comment noted. July 2020 was the review date on the draft guidance as that was the date that the draft version was completed. It was always the intention to review 12 months from publication of the final version.</p> <p>Comment noted.</p>
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Actions to be implemented:

- Update the guidance to include a link to Trading Standards Departments.
- Update the guidance to include advice on how verification of a slaughterman's Certificate of Competence or WATOK licence can be obtained.
- Update the guidance to include a link to approved slaughterhouses.
- Review the links in the guidance and make them more specific where we can.
- Review the Q & A section of the guidance to provide some information with regards to the on farm slaughter of casualty animals.
- Provide some additional clarity around question 11 in the Q & A section of the guidance "*can I have an animal privately slaughtered other than in an approved slaughterhouse?*"
- Review paragraph 15 of the guidance with regards to SRM disposal and provide readers with a link to approved animal by product disposal sites (including SRM) or refer them to the link in Annex A.
- Update the guidance to include a link to approved slaughterhouses.
- Update the contacts page of the guidance to clarify points of contact.
- Review point 4 of the guidance to clarify the reporting of home slaughter (deaths) of animals to the appropriate agencies.
- Update the guidance to provide a specific link to the Humane Slaughter Association publication on humane slaughtering on farm.
- Update the guidance to include the titles of the annexes on the contents page.
- Update the guidance to place more emphasis on the likelihood of home slaughter carrying a greater human health risk than slaughter that takes place in approved premises
- Update the guidance to include best practice for both the farmer and the slaughterman carrying out the home slaughter (on behalf of the owner) to keep a record of when the slaughterman's services are used.