

## CHAPTER 7.6.

**ANIMAL WELFARE AT THE TIME OF KILLING FOR  
PURPOSES OTHER THAN SLAUGHTER**

<b>Norway</b>	<p><b>Category:</b> General</p> <p>Norway thanks WOAHP for its continuing work in redrafting this chapter on the welfare of animals that are killed. We can in general support the redrafted version of the chapter. Yet, we do still have additional comments as indicated below.</p> <p><b>Supporting evidence:</b> not relevant</p>
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Article 7.6.3.

**General principles for the operations regarding the killing of animals**

The decision as to whether to kill animals due to compromised welfare should not be delayed if there is any risk to the welfare of those animals. The recommendations in this Chapter are based on the premise that a decision to kill the animals has been made and they address the need to ensure ensure that consider the animal welfare concerns are managed prior to and during the killing process and until of the animals are dead.

<b>Norway</b>	<p><b>Category:</b> Editorial</p> <p><b>Proposed amended text:</b></p> <p><b>After first sentence:</b></p> <p><b>The decision as to whether to kill animals due to compromised welfare should not be delayed if there is any risk to the welfare of those animals. <u>The decision maker should be clearly identified beforehand to ensure there is no delay in decision making.</u></b> The recommendations in this ...</p> <p><b>Rationale:</b></p> <p><b>The fifth paragraph in this article and its first sentence are almost identical. Whereas the second sentence in the fifth paragraph should be mentioned at the start of the article. We suggest moving that sentence here.</b></p>
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The decision as to whether to kill animals should not be delayed if their welfare is compromised. The decision maker should be clearly identified beforehand to ensure there is no delay in decision making is not delayed.

<b>Norway</b>	<p><b>Category:</b> Editorial + deletion</p> <p><b>Proposed amended text:</b></p> <p><del>The decision as to whether to kill animals should not be delayed if their welfare is compromised. The decision maker should be clearly identified beforehand to ensure there is no delay in decision making</del></p>
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	<p><b>Rationale:</b></p> <p><b>The first sentence in this paragraph is almost identical to the first sentence in the article. Whereas the second sentence should be mentioned at the start of the article. We suggest moving it to the first paragraph.</b></p>
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All personnel involved in the killing of animals should have the relevant skills and competencies acquired through training or experience.

<b>Norway</b>	<p><b>Category: change</b></p> <p><b>Proposed amended text:</b></p> <p><b>All personnel involved in the killing of animals should have the relevant skills and competencies, acquired through training <u>and</u> <del>or</del> experience.</b></p> <p><b>Rationale:</b></p> <p><b>The skill of the staff is identified by EFSA as an important hazard not only during restraint/handling, but also at stunning and killing. Some of the opinions are listed below. We would therefore suggest that all personnel are given training even if they have experience. Given that the staff’s knowledge is crucial in avoiding animal welfare hazards, one could argue that everyone involved should be provided with training at regular intervals to ensure that their knowledge is regularly updated. We are aware that it may be a sensitive issue that experience alone is not sufficient, but people may have experience in killing animals or in the use of the methods but not have focused on the welfare aspects of the procedure. If everyone is required to complete training programs, there is no stigma attached to experience not being accepted as adequate enough. It would be possible to have different types of training programs, one for beginners and one for those with experience. We therefore propose to replace “or” with “and”. This is also in line with the first paragraph of article 7.6.5., first and second sentence.</b></p> <p><b>Supporting evidence:</b></p> <p style="padding-left: 40px;"><b>EFSA, 2024: Welfare of horses during killing for purposes other than slaughter.</b></p> <ul style="list-style-type: none"> <li>• <b>EFSA 2024: Welfare of sheep and goats during killing for purposes other than slaughter.</b></li> <li>• <b>EFSA, 2020: Scientific opinion concerning the killing of rabbits for purposes other than slaughter. In this opinion, the staff was identified as the origin for all 14 hazards, either due to lack of the appropriate skill sets needed to perform tasks or due to fatigue.</b></li> </ul>
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Article 7.6.9.

### Handling of animals

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1. Animal welfare concerns
2. Animal-based and other measures:

### 3. Recommendations

...

Electric goads should not be used, except in extremely rare circumstances where the safety of human handlers or other animals is at risk and there is no other option routinely, but only when other measures have been ineffective, or the animal has no injury or other condition and there is room for the animal to move forward.

<b>Norway</b>	<p><b>Category: editorial + deletion</b></p> <p><b>Proposed amended text:</b></p> <p><b>Electric goads should not be used, except in extremely rare circumstances where the safety of human handlers or other animals is at risk and there is no other option, <u>or</u> the animal has no injury or other condition and there is room for the animal to move forward.</b></p> <p><b>Rationale:</b></p> <p><b>Linguistic and for welfare reasons. On page 234 of annex 3 the proposal made by Canada which WOAHA agreed to, is cited and Canada did not include the word “or”. In fact, the inclusion of the word “or” implies that there are two circumstances where electric goads may be used: a) in extremely rare circumstances or b) when the animal has no injury and can move forward unhindered. This is not the intention, as it would allow for the use of electric prods in very many cases and indeed might then be used routinely. The second part of the sentence is meant to be part of the conditions that need to be present also in the rare circumstances mentioned in the first part of the sentence. The word “or” therefore needs to be deleted.</b></p>
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Article 7.6.19.

#### **Electrical — two-stage application**

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1. Animal welfare concerns
2. Animal-based and other measures
3. Recommendations
4. Species-specific recommendations

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For electrical stunning of the head, minimum parameters are recommended for the following species:

- 1.5 25 A for bovines cattle,
- 1.3 A for pigs,
- 1.8 A for sows and boars,
- 1.0 A for small ruminants.

<b>Norway</b>	<p><b>Category: change and editorial</b></p> <p><b>Proposed amended text:</b></p> <ul style="list-style-type: none"> <li>- <del>1.5 A</del> <del>1.25 A</del> for cattle,</li> <li>- 1.3 A for pigs,</li> <li>- 1.8 A for sows and boars,</li> <li>- <del>1.0 A</del> <del>1.25A</del> for small ruminants.</li> </ul> <p><b>Rationale:</b></p> <p>We have checked annex 3 (page 318) to see the reasoning behind the changes that have been made, and we suspect that some typographical errors have been made during the altering of the values of the electrical parameters. We notice that the UK suggested changing the values for bovines to 1.25-1.28 A depending on the age of the animal. WOAH did not agree to do this. Whereas Australia suggested to increase the value for small ruminants from 1.0 A to 1.25 A. WOAH agreed to make this change.</p> <p>In Norway we have practical experience that shows that the value of 1.0 A is too low for sheep and there is a risk of the animals not being stunned. We therefore use higher values in line with the Australian suggestion. We also refer to an old article published by Steve Wotton, which demonstrates that the values WOAH indicated that they agreed with in Annex 3, are the scientifically correct ones.</p> <p><b>Supporting evidence:</b></p> <p>S. B. Wotton, N. G. Gregory, R E. Whittington, I. D. Parkman: Electrical stunning of cattle. <i>Veterinary Record</i> (2000)147, 681-684</p> <p>Musk, G.C.; Johnson, C.B. Commentary: A Comparison of the Methods of the Pre-Slaughter Stunning of Cattle in Australia— Mechanical, Electrical, and Diathermic Syncope. <i>Animals</i> 2024, 14, 3141.</p>
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Article 7.6. 212.

#### **Water bath killing**

1. Animal welfare concerns
2. Animal-based and other measures

Multiple indicators should be used to determine whether killing is effective.

Animal-based measures of an effective electrocution are: absence of muscle tone; apnoea; and absence of corneal or palpebral reflex; absence of vocalisation and absence of righting reflex.

a) loss of muscle tone:

b) absence of breathing:

c) absence of corneal or palpebral reflex:

d) absence of righting reflex:

e) absence of heart beat.

Norway	<p><b>Category: deletion</b></p> <p><b>Proposed amended text:</b></p> <p><u><del>d) absence of righting reflex:</del></u></p> <p><b>Rationale:</b></p> <p>We have checked Annex 3 page 333 to see the reasoning for the changes made. WOAHA agreed with the Norwegian proposal to delete absence of righting reflex. This has been done in the text above the bullet points, yet bullet point d) is retained. As previously mentioned, birds that are merely immobilised but not stunned will not be able to demonstrate a righting reflex. This animal-based measure is unreliable and should therefore not be mentioned as a measure of an effective stun.</p> <p><b>Supporting evidence</b></p> <p><b>EFSA opinions</b></p> <p><b>Killing for purposes other than slaughter: poultry, p. 54:</b> “<i>Despite some exceptions, such as electro-immobilisation or other provoked paralysis, an animal can be presumed to be unconscious when it loses its natural standing position, is not awake and does not show signs of positive or negative emotions such as fear or excitement.</i>”</p>
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Article 7.6.246.

#### Pre-filled gas container

1. Animal welfare concerns
2. Animal-based and other measures
3. Recommendations

~~This method is suitable for poultry, pigs, small ruminants and fur animals.~~

Containers should allow the required gas concentration to be maintained and accurately measured.

Norway	<p><b>Category: change</b></p> <p><b>Proposed amended text:</b></p> <p>Containers should allow the required gas concentration to be maintained <u>and accurately measured.</u></p> <p><b>Rationale:</b></p> <p>We have checked Annex 3 page 360 to see the reasoning for the deletion of the words “and accurately measured”. We could not find that any Member of WOAHA had proposed to have those words deleted.</p> <p>Indeed, in number 2 of this article, it is highlighted that it is difficult to assess animal-based measures in the container. In article 7.6.26 number 2 it is stated that “<i>gas concentrations should be monitored and used as a</i></p>
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	<p><i>proxy for animal-based measures</i>". We believe this is true for all the methods using gas, as it is not possible to assess the birds themselves during the introduction/application of gas. We therefore ask WOAH to reinsert the words "and accurately measured" as it is a prerequisite for proper use and control of the method.</p>
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