

12.01.2015

Commissioner Andriukaitis
Commissioner for Health
European Commission
B-1049 Brussels
Belgium

Address for reply:
Siri Kampmann
Burgstr. 106
60389 Frankfurt, Germany
E.: s.kampmann@animal-
welfare-foundation.org

Dear Commissioner,

Stunning and slaughter of pigs with carbon dioxide gas

The animal welfare organizations and political parties signing this letter believe that CO₂ stunning of pigs is incompatible with proper standards of animal welfare. CO₂ is aversive and causes pain and suffering.

Footage on the website of a Dutch animal welfare organization shows the welfare problems involved in the use of CO₂: <http://www.eyesonanimals.com/stunning-of-pigs-before-slaughter/>

Scientific research has for almost 20 years shown that CO₂ stunning/slaughter of pigs involves severe welfare problems and a high degree of suffering. In 1996 Raj and Gregory concluded that pigs show profound aversion to a high concentration of CO₂ and that this gas leads to "severe respiratory distress".ⁱ

Council Regulation 1099/2009 on the protection of animals at the time of killing requires a minimum concentration of 80% CO₂ to be used. In 2004 the European Food Safety Authority (EFSA) concluded that at concentrations above 30%, CO₂ "is known to be aversive and cause hyperventilation and irritation of the mucous membranes that can be painful, and elicits hyperventilation and gasping before loss of consciousness". EFSA recommended that "the gas used to induce unconsciousness should be non-aversive" and stressed that the development of alternative humane gas mixtures was a high research priority. <http://www.efsa.europa.eu/de/efsajournal/doc/45.pdf>

In 2008 research concluded that pigs suffer from fear, pain and stress for up to 60 seconds during immersion into CO₂.ⁱⁱ

Recital 6 of Council Regulation 1099/2009 states: "Recommendations to phase out the use of carbon dioxide for pigs ... are not included in this Regulation because the impact assessment revealed that such recommendations were not economically viable at present in the EU. However, it is important to continue this discussion in the future."

TFEU, Article 13 provides: "In formulating and implementing the Union's agriculture ... policies, the Union and the Member States shall, since animals are sentient beings, pay full regard to the welfare requirements of animals,"

Today, in 2014, nothing has changed.

Scientific research has been clear since 1996 that the use of high concentrations of CO₂ to stun/slaughter pigs is profoundly aversive and leads to severe respiratory distress. Despite this, no alternatives have been developed. Scientists tell us that they have tried to get sponsors for research in this field again and again, without success. We are concerned that many slaughterhouses are changing their stunning system and switching to CO₂.

In some member states big slaughterhouse plants and/or researchers are trying to develop animal friendly alternatives. But there seems to be no exchange of information and this may be due to the question of who might get the patent for a new method. Regulation 1099/2009 stresses that it is important for the discussion on phasing out the use of CO₂ for pigs to continue but five years after the adoption of the Regulation no effective steps appear to have been taken to develop a non-aversive alternative to CO₂.

We believe that the Commission must now act urgently to ensure that non-aversive alternatives are developed in order to meet its obligation under TFEU Article 13 to pay full regard to the welfare requirements of animals in the formulation and implementation of EU agriculture policy.

We urge the Commission to take the lead - in conjunction with the meat industry - in ensuring that substantial resources are committed to the urgent development of a better stunning method for pigs before slaughter. In particular, we urge the Commission to:

- sponsor a panel of experts to find an animal-friendly alternative.
- set a date for the phasing-out of CO₂ and the implementation of better methods.

With kind regards



Romana Sonkova
Compassion in World Farming, Czech Republic

COMPASSION
in world farming 
ciwf.org



Agathe Gignoux
Compassion in World Farming, France

COMPASSION
in world farming 
ciwf.org

Olga Kikou

Olga Kikou
Compassion in World Farming, Greece



Geert Laugs

Geert Laugs
Compassion in World Farming, The Netherlands



Peter Stevenson

Peter Stevenson
Compassion in World Farming, United Kingdom



Cecilia Mille Lindblom

Cecilia Mille Lindblom
Djurens Rätt/Animal Rights, Sweden



Michel Courat

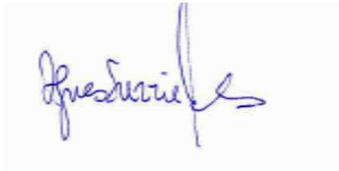
Michel Courat
Eurogroup for Animals, Brussels, Belgium



Andrea Silva

Andrea Silva
Party for Animals and Nature,
Portugal





Agnes Freitas
Madeira Legislative Assembly
Party for Animals and Nature, Portugal



Marianne Thieme
Chair of the Animal Rights Party in the
House of Representatives, the
Netherlands



Siri Kampmann
Tierschutzbund Zürich/Animal Welfare Foundation
Germany



Sabrina Gurtner
Tierschutzbund Zürich/Animal
Welfare Foundation, Switzerland



Levente Penzc
Welfarm, Hungary

ⁱ Raj A.B.M. & Gregory N.G., 1996. Welfare implications of the gas stunning of pigs: 2. Stress of induction of anaesthesia. *Animal Welfare* 1996, 5: 71-78.

ⁱⁱ Rodriguez P, 2008. Assessment of unconsciousness during carbon dioxide stunning in pigs *Animal Welfare* 2008, 17: 341-349