

Part VI — Summary of recommendations

Recommendations for legislation

1. An offence of causing unnecessary suffering to be added to the Markets (Protection of Animals) Order 1964 (paras 28 and 166).
2. Market operator to appoint person to be responsible for animal welfare and to arrange for a poster to be displayed giving the person's name and how he can be contacted (para 33).
3. Name, location and telephone number of local authority inspectors and name and telephone number of local DVO to be displayed on posters in the market (para 33).
4. Fixed ramps to be incorporated in plans when new market premises are being constructed or where significant alterations are being made to existing market premises (para 43).
5. Unloading/loading area to be of sufficient size to accommodate expected maximum volume of throughput (para 43).
6. Side protection to be provided for unloading ramps to prevent animals falling off (para 43).
7. Sick or injured animals must not be forced off vehicles and any such animals identified to be inspected by a veterinary surgeon and unloaded under his supervision (para 43).
8. Entry to auction ring to be restricted to auctioneer, necessary market personnel and vendor or his representative (para 50).
9. Entrances to, exits from and passageways to sale ring to be kept clear for the passage of animals (para 50).
10. Unnecessary harassment to animals moving to and from pens, during the auction and in the auction ring to be prevented (para 50).
11. A provision, on the lines of Article 6(2) of the Transit of Animals (Road & Rail) Order 1975 to ensure that an animal is not caused injury or unnecessary suffering by reason of a number of stated causes, to be added to the Markets (Protection of Animals) Order 1964, as amended (para 56).

12. Identification by means of an armband, badge or uniform for employees of the auctioneer or market operator who are handling stock (para 58).
13. An amendment should be made to the Markets (Protection of Animals) Order 1964, as amended, to require that animals arriving in the market the night before exposure for sale should be fed and watered before 11 pm (para 72).
14. The legislation relating to feeding and watering intervals to be further examined (para 73).
15. Lambs and goat kids under the age of four weeks to be included within the scope of Article 6 of the Markets (Protection of Animals) Order 1964, as amended (paras 82 and 150(a)).
16. Adequate ventilation must be provided in covered sections of markets (para 85).
17. The legislation shall require that the sides of passageways should not have dangerous projections (para 96).
18. Calves, pigs and dairy cattle in milk or in calf should be bedded on suitable clean bedding material. Bedding to be provided for all other species where appropriate (para 100).
19. All bulls over 10 months of age in markets must be penned individually except that (i) bulls which are halter broken may be tied by the neck or haltered and (ii) bulls not showing any permanent incisor teeth, have been reared together as a group and are polled, dehorned or disbudded may be penned together without being secured by the head or neck. Such animals should only be penned together if originating from the same group (para 106).
20. Pen sides, barriers and any passageways along which bulls may pass should stand at least 5'6" in height (para 106).
21. All cattle to be presented for sale without horns (other than rudimentary or stub horns). Provision to be made for a three year phasing-in period and for an exemption for cattle presented as specialist breeds (para 111).
22. A provision to be made in the Markets (Protection of Animals) Order 1964 to make it an offence to hold in a market an animal likely to give birth during that time (para 114).
23. Article 5(5) of the Markets (Protection of Animals) Order 1964 should be amended to provide, exceptionally, for cows with calf at foot which have been reared together and are of mutually acceptable disposition to be penned together, provided pens are not overstocked (para 115).
24. Emergency pens should be provided for isolating sick and injured animals. In addition, these facilities should be clearly identified and the public should be denied access to them (para 118).
25. Entry to the auction ring should be restricted only to the vendor or his representative and necessary market personnel (paras 119 and 145).
26. Legislation should require market operators to ensure adequate lighting for the inspection, feeding and watering of animals after dark (para 121).

27. Calves found to be weak, injured or sick on arrival at markets should be moved to specially designated isolation pens for immediate veterinary attention (para 145 (b)).

28. Market operators shall not accept for sale any calf under 56 days of age if there is reason to believe that it has previously been presented for sale at any market more than once within the previous 28 days. An exception can be made when the calf is returned unsold to the premises on which it was born (para 145(e)).

29. Auctioneers must keep a record of the ear number, breed, sex and date of birth of each calf exposed for sale in a market together with names and addresses of vendors and purchasers. These records should be made available to the purchaser and should be retained for at least one year. The auctioneer must include the date of birth on the purchaser's invoice (para 145(f)).

30. Calves should be sold and removed from the market after sale as soon as possible and in any case should not be kept on market premises longer than 12 hours (para 145(g)).

31. All holding pens should be provided with a sufficient quantity of clean dry bedding (para 145(l)).

32. Calves must not be muzzled or tied up in the pen (para 145(o)).

33. Goats should be accommodated in pens suitable for the purpose (para 153).

34. It should be an offence to sell birds in unsuitable cages (para 159).

35. Poultry should be transported in suitable crates, baskets or boxes, and not in sacks or plastic bags (para 162(b) — see also Recommendation 64).

36. Legislation should specifically ban the tying of poultry by the wings or legs (para 162(f)).

37. Where poultry are slaughtered in a market, they should be slaughtered quickly and humanely by competent operatives approved by the market operator and such slaughter should be carried out in suitable premises set aside for that purpose (para 162(h)).

38. Emergency feeding and watering facilities for birds should be available (para 162(j)).

39. Legislation should require rabbits to be given an adequate supply of drinking water (para 166).

Contents of Proposed New Order for Horses (para 189)

40. An offence of causing unnecessary suffering by reason of a number of stated causes.

41. Foals which have not been weaned must not be presented for sale except when at the foot of their dams.

42. All unloading and loading ramps as part of market premises must have a suitable non-slip surface and should be provided with adequate side protection to prevent animals falling off.

43. The following classes of animals to be individually penned: stallions, cryptorchids (rigs), fractious animals, heavily pregnant mares, mares with foals at foot and animals whose hind feet are shod.
44. Animals to be so contained and distributed within the pens as to avoid injury, overcrowding or other cause of unnecessary suffering, regard being had where necessary to unfitness and to differences in age and size.
45. The excessive use of any instrument or thing used for driving animals must be prohibited.
46. An adequate supply of clean drinking water and a means of supplying it to the animals must be provided.
47. Every animal within the sale yard must be provided with an adequate supply of suitable clean drinking water as often as is necessary to prevent it suffering from thirst.
48. Where animals are kept overnight, sufficient hay racks or nets, food troughs or buckets and adequate and suitable bedding must be provided. Proper supervision must also be provided.
49. Animals kept overnight in the sale yard must be given suitable food at appropriate intervals. Hay must be given in racks or nets and feedingstuffs in troughs or buckets.
50. Pens, boxes and stalls used for the animals must be such that there are no dangerous projections and the risk of injury is minimised.

Recommendations for better enforcement

51. Local Authorities to be reminded of the vital importance of their enforcement role (para 29).
52. Market operator to regularly supervise unloading and loading. Local authority inspector to be present (para 43).
53. There should be better enforcement of the provisions of the Transit of Animals (Road and Rail) Order 1975, as amended, to ensure that animals are not caused suffering by being transported in vehicles or under conditions which are unsuitable (para 43).
54. There should be better enforcement of all existing legislation relating to feeding and watering (para 73).
55. The SVS to be reminded of their enforcement responsibilities under the Agriculture (Miscellaneous Provisions) Act 1968, in respect of animals laired in fields or buildings which are off market premises (para 79).
56. The requirements of Article 6 of the Markets (Protection of Animals) Order 1964, as amended, on the provision of covered accommodation for calves, dairy cows in milk and pigs should be strictly enforced (para 84).
57. Article 5(2) of the Markets (Protection of Animals) Order 1964, as amended, relating to the distribution of animals in pens, taking account of the size and the species should be strictly enforced (para 93).

58. During phasing-in period (see recommendation 21), Article 5(4) of the Markets (Protection of Animals) Order 1964, as amended, requiring separation of horned cattle from those without horns, unless both are secured by the head or neck, should be strictly enforced (para 111).

59. That particular attention be paid to the height of the pens in which boars are held (para 112).

60. There should be strict enforcement of the requirements of Article 4(1) of the Transit of Animals (Road and Rail) Order 1975, as amended, relating to the protection of animals during unloading and loading (para 145(i)).

61. Pens should not be overstocked and calves should have sufficient space in which to lie down in comfort (para 145(m)).

62. Enforcement authorities and market operators to be reminded that goats are subject to some of the provisions of the Markets (Protection of Animals) Order 1964, as amended, in the same way as for other species (para 153).

63. To prevent rough handling of birds, the provisions contained in the Conveyance of Live Poultry Order 1919, the Poultry (Exposure for Sale) Order 1937 and the Slaughter of Poultry (Humane Conditions) Regulations 1984 must be strictly enforced (paras 159 and 162(a)).

64. Poultry should be transported in a suitable crate, basket or box. They must not be carried in sacks or plastic bags (para 162(b)).

65. Receptacles and cages must not be overcrowded and must be large enough for birds of each species to stand upright. Article 3 of the Conveyance of Live Poultry Order 1919 must be enforced (para 162(d)).

66. Geese and turkeys must not be forced into cages designed for hens and cage doors must be sufficiently large to enable birds to be caged without undue force (para 162(e)).

Recommendations for Proposed Code of Practice

67. Animals to be unloaded and loaded in a calm, unhurried manner (para 43).

68. Producers and market operators to stagger arrival of vehicles at markets to minimise waiting time and prevent ventilation problems (para 43).

69. Market operators to regularly supervise unloading and loading. Local authority inspector to be present (para 43).

70. Where the use of sticks is considered to be essential they should be used to the minimum possible extent (para 54).

71. The quantity and quality of feedingstuffs available for stock in the market must be suitable (para 73).

72. Where practicable animals which have been housed in covered accommodation on the farm of origin should be penned in covered accommodation in the market (para 82).

73. Where possible newly shorn sheep should be penned in sheltered areas of the market (para 83).
74. All pens, auction rings and passageways must be provided with non-slip, well-drained flooring and suitable arrangements must be made to prevent animals slipping on market premises, particularly during wet weather. Drains should be of adequate size and manholes should be covered in non-slip material (para 91).
75. Market operators should bear in mind the seasonal fluctuations in stock numbers so that the number of entries does not exceed the capacity of the market (para 92).
76. Vertical rails for cattle pens should be encouraged (para 94).
77. Where animals are being certified for premium purposes, passages should be designed to lead into a crush and weighbridge so that animals can be examined and certified in appropriate order with the minimum of stress (para 97).
78. Where there is a significant throughput of dairy animals, hygienic and adequate provision for milking of cows in milk must be made, together with arrangements for the sterilisation of all milking equipment. In addition a) milking should be carried out only by skilled personnel; b) overstocking of the udder should not be allowed; c) lactating animals should be milked as soon as possible after sale and in any case before leaving market premises; and d) warm water should be provided for washing cows (para 117).
79. Market operators should ensure that fire fighting equipment is available at market premises; such equipment to be regularly inspected and maintained in good working order; emergency water supplies to be available for such purposes (para 122).
80. The condition of calves on arrival at market should determine their acceptability for sale. Specially designated isolation pens located as near as practicable to the entry point(s) must be available for weak, injured or sick calves (para 145(a)).
81. No calf under seven days of age shall be sold through a market (para 145(c)).
82. No calf with a wet navel shall be displayed for sale (para 145(d)).
83. Goads or sticks should not be used on calves (para 145(h)).
84. All holding pens should have at least three solid sides and a gated front (para 145(k)).
85. Calves of significantly differing sizes should not be penned together (para 145(n)).
86. If an auction ring is used for calves it should be in close proximity to the pens (para 145(p)).
87. Pens used for housing lambs and goat kids less than four weeks old must be adequately bedded and free from draughts (paras 150(b) and 154).
88. Lambs and goat kids less than four weeks old must not be retained in the market for longer than absolutely necessary and in any case no longer

than six hours. Market operators should arrange for them to be sold at the earliest possible opportunity (paras 150(c) and 154).

89. Lambs and goat kids less than four weeks old to be sold in their pens and not through the auction ring and moved around the market to the minimum possible extent (paras 150(d) and 154).

90. Lactating goats must be properly cared for and overstocking of their udders should not be allowed (para 153).

91. Dogs should be prohibited from the area where poultry are sold (para 162(c)).

92. Poultry must not be handled unnecessarily (para 162(g)).

93. Birds should not be moved from their cages to a sale ring (para 162(i)).

94. Rabbits should be held in suitable covered accommodation which is properly maintained and is free from draughts and extremes of temperature (para 165(i)).

95. Rabbits kept overnight should be fed and watered. The standard of accommodation should be in accordance with the recommendations in the Council's draft Code of Recommendations for the Welfare of Rabbits, submitted to Agriculture Ministers (para 165(ii)).

96. Rabbits should not be picked up or carried by the ears only, nor should they be transported in sacks or bags (para 165(iii)).

97. Where rabbits are slaughtered in a market, they should be slaughtered quickly and humanely by competent operatives approved by the market operator. Such slaughter should be carried out in suitable premises set aside for that purpose (para 165(iv)).

Code of Practice for Horses (Para 190)

98. If broken horses are led, they should be led by a suitable means. Unbroken horses should not be led.

99. If horses are ridden in the market, they must be ridden by experienced people and if possible a specified area of the market should be provided for this purpose.

100. If animals are restrained, proper head collars or halters should be used.

101. Separate entrances and exits to the auction ring should be provided. Where this is not possible animals should not pass in a confined space.

102. Where horses enter the sale ring by crossing over a cattle crush or weighbridge, movement of the platform should be kept to a minimum.

103. Wherever possible, loading and unloading of animals should take place in a designated area provided within the sale yard. Straw, peat, sawdust or other suitable material should be used where necessary on ramps.

104. Entrances to, exits from and passageways to sale rings should be kept clear for the passage of animals. Entry to sale rings should be restricted to the auctioneer, necessary market personnel and the vendor or his representative.

105. The number of animals presented at a market, sale or fair should not exceed the capacity of the market, sale or fair.

106. Normally, broken and unbroken horses should not be penned together but in some circumstances this may be appropriate.

Other recommendations

Design and construction

107. Where new markets are being built or existing markets are being improved, market operators should seek expert advice e.g. from the consultancy service operated by the MLC and should ensure that the location, design, accommodation and facilities take account of the welfare needs of the animal (para 78).

108. The layout and operation of the market should be such that movement of animals is reduced to a minimum (para 78).

109. Where practicable, new markets should be sited in locations which allow for future expansion (para 78).

110. Market operators and authorities owning markets should be encouraged to improve the facilities provided and where available utilise Government and/or EC grants (para 78).

111. Those responsible for making grants towards the cost of new or the improvement of existing markets/facilities, to bear in mind any relevant welfare provisions and recommendations e.g. in legislation and in Codes of Practice (para 78).

112. Sale rings should, where practicable, have sides whose overall height is 6'6" (2 m) preferably with an inwardly curving top (para 120).

General

113. Agriculture Departments to encourage stronger liaison between SVS field staff and local authorities (para 30).

114. Market operators to appoint a veterinary surgeon to attend beginning of sale and advise on fitness of animals to be put through the ring (para 30).

115. Identification badges, armbands or distinctive clothing to be worn by local authority inspectors and SVS personnel (para 34).

116. Market operators to use a system of 'buyers pens' (para 44).

117. To eliminate the practice of ear punching of cattle and sheep, Ministers should consider, as a matter of urgency, the feasibility of alternative methods of certification under the variable premium schemes (para 131).

118. All calves exposed for sale should have received adequate colostrum (para 144).

119. A multi-language poster to be displayed in a prominent position in the poultry section stating that it is an offence to cause suffering to any animal or fowl and that such persons are liable to prosecution (para 161).

Part VII — Appreciation

A comprehensive review such as we have carried out and the preparation of a detailed report inevitably involve the participation and cooperation of many people.

I am particularly grateful to the Members of the Council, especially to those of our Markets Working Group, who freely gave of their time in undertaking this review.

My thanks are also due to all who eased the way for our fact finding visits, particularly to the auctioneers and market operators and their staff who allowed us to observe their work, the Diseases of Animals Inspectors, RSPCA and SPCA Inspectors and officers of the State Veterinary Service who were generally present on our visits and contributed much useful information.

We also received considerable help from the administrative and veterinary staff of the Ministry of Agriculture, Fisheries and Food and the Department of Agriculture and Fisheries for Scotland, who provided us with information and technical advice.

Finally, we are grateful to the Council's Secretariat who have had the responsibility for organising and arranging all stages of this review and on whom much of the work in preparing the report has fallen.

Professor Sir Richard Harrison
(Chairman)

Farm Animal Welfare Council

The Farm Animal Welfare Council was set up in July 1979 by the Minister of Agriculture, Fisheries and Food and the Secretaries of State for Scotland and for Wales under the Chairmanship of Professor Sir Richard Harrison, Emeritus Professor of Anatomy, University of Cambridge. It has been given the responsibility of keeping under review the welfare of farm animals on agricultural land, at markets, in transit and at the place of slaughter. The Council advises Agriculture Ministers of any legislative or other changes that may be necessary and as an independent advisory body is free to publish any advice so given.

Members of the Council are appointed by Ministers and serve in a personal capacity.

They are:

Chairman:

Professor Sir Richard Harrison, FRS, MA, MD, DSc, MRCS, LRCP.

Members:

*Mr C B Atkinson, ARICS

Rev A L Birbeck, MA

Mr R Bradley

Mr S Burgess, FBIM

*Mr J H Cullimore, MBE, JP

Professor J M Cunningham, CBE, BSc (Agric), PhD, FRSE, FI Biol.

Dr M S Dawkins, MA, D Phil

*Mr R Ewbank, MVSc, MRCVS, FI Biol

Mrs J Graham

Mr T Harris

Mrs R Harrison

Mr D L Haxby, MRCVS

Mr J A Inverarity

Mr M R Lampard

*Mr R Macpherson, MRCVS

*Mr E T Marsh, BEM

Mr W Rossington
Dr D W B Sainsbury, MA, BSc, MRCVS
Mr P Staines
*Mr J G Thomas, BSc (Agric)
Mr T R Tudor
Professor A J F Webster, MA, Vet MB, PhD, MRCVS

*Members of the Markets Working Group

The late Mr P L Brown, BSc, MRCVS was also a member of the Markets Working Group.

Professor J O L King, PhD, MVSc, BSc(Agric), FRCVS, FI Biol, was Chairman of the Markets Working Group until his retirement in December 1984.

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Organisations and individuals who gave oral and written evidence

The following gave oral evidence:

Association of County Councils

Mr W Rossington

Mr K G Shaw

Convention of Scottish Local Authorities

Mr J R McCluskey

Mr W T Forrest

Mr A Smith

Institute of Auctioneers and Appraisers in Scotland

Mr R Calder

Mr R L Fraser

Mr P U Lawson

Mr J Storie

Livestock Auctioneers' Market Committee

Brig. A W Carter

Mr T C Daulby

Mr B James

Mr S M Lister

Mr L W Northen

Mr R J Steel

Mr M G Wyatt

National Association of British Market Authorities

Mr W D Johnson

Mr C Marley

Councillor L McDonald

Mr G Milden

Mr B Ormshaw

National Farmers' Union

Mr G A Catchpole

Mr D Lloyd

Mr J Raine

National Farmers' Union of Scotland

Mr J Sharp

The following gave written evidence:

Animal Health Trust

Animal Husbandry Department, Bristol University

Association of County Councils

Bransby Home of Rest for Horses

British Equine Veterinary Association

British Horse Society

British Mule Society

British Poultry Federation Limited

British Veterinary Association

Central Council of Societies in Scotland for Prevention of Cruelty to
Animals

Cleveland Bay Horse Society

Dartmoor Livestock Protection Society

Donkey Sanctuary, Sidmouth

English Connemara Pony Society

Exmoor Pony Society

Farm Animal Welfare Co-ordinating Executive

Farmers' Union of Wales

Fell Pony Society

Horse Rescue Fund

Horses and Ponies Protection Association

Humane Slaughter Association

International League for the Protection of Horses

Livestock Auctioneers' Market Committee for England and Wales

Melton Mowbray Cattle Market

National Association of British Markets Authorities

National Equine Welfare Committee

National Farmers' Union—Concern for Animals Group

Pennine Group Against Live Animal Exports

Quaker Concern for Animal Welfare

Road Haulage Association Limited

Royal College of Veterinary Surgeons

Royal Society for the Prevention of Cruelty to Animals

Society for the Humane Disposal of Surplus Ponies

Society for the Prevention of Cruelty to Animals—Glasgow and West of
Scotland

Universities Federation for Animal Welfare

Welsh Pony and Cob Society

World Society for the Protection of Animals

In addition, written submissions were received from 60 members of the public.

Working practices for drovers

Introduction

1. Droving animals is a skilled task requiring a thorough understanding of animal behaviour. To be done well it requires patience and sympathy. Drovers should be appointed by the auctioneer or market authorities and given some form of identification, such as a uniform, an armband, a badge or label which should be worn at all times when on duty.

General

2. Even though a drover's duty within the market is to move stock at various times from one section to another, at all times he or she should be aware that the animal is likely to be in strange surroundings and therefore all obstacles, including people, should be kept clear of livestock movements wherever possible. Drovers should have the authority to clear members of the public from livestock routes through the market and should discourage members of the general public, other than prospective purchasers, from interfering with penned animals.

3. The excessive use of sticks, goads and electric goads should not be tolerated. Shouting and the waving of arms should be avoided. Sticks should be used as an extension of the arm for guidance of the animal and thereafter only for gentle persuasion. Animals should not be poked with sharp instruments.

4. Animals should be penned in groups of matching size and in numbers which allow them sufficient room to lie down in comfort.

5. When taking stock into or out of pens, the drover should be certain that all stock is on its feet prior to any movement.

6. The drover should at all times be aware of the welfare code practised within the market and should be advised by the employer or market operator, that failure to abide by that code would be sufficient grounds for dismissal.

7. If dogs are used within the confines of the market they must be extremely well trained and expertly controlled; untrained dogs should be excluded from the market.

Cattle

8. Sticks and goads should be used as an extension of the arm for guidance of the animal and thereafter only for gentle persuasion.

9. Horned and polled cattle must be penned separately unless both classes are secured by the head or neck.

10. Any animal found to be a bully when penned with others should be removed and penned separately.

11. Bulls should be dealt with in accordance with the recommendations at paragraphs 106-107 and Appendix D.

12. Dairy cattle in milk or in calf should be tied, stalled or penned individually whenever possible.

13. Liaison with the vendor prior to presentation of stock in the ring for sale, thereby enabling sorting within the holding pens prior to entry into the ring, should be encouraged.

Sheep

14. Sticks should not be used; shepherds crooks should be encouraged for catching sheep.

15. Where sheep are handled they should be led by the horn or wool on the neck. If the sheep has to be lifted it should be held by the neck and flank and not lifted by the wool.

16. Sheep (other than rams) should not be penned singly unnecessarily and the use of an approved mark should be encouraged for identification purposes so that groups can be placed together in pens.

17. Newly shorn animals should be accommodated in sheltered areas of the market wherever possible.

Pigs

18. The use of pig boards should be encouraged at all times for the movement of pigs.

19. The use of electric goads is permitted provided they are used as gentle persuaders when the animal is heading in the right direction.

20. When pigs are offered for sale in batches or litters the size of the pen should be appropriate for the number and size of pigs in the batch.

21. Cast stud boars must be effectively separated from other animals.

Guidelines/recommendations for the handling and accommodation of bulls in markets

Handling

1. The handler of all bulls, in conjunction with the market operator, must ensure that they are moved safely and under control throughout the market.
2. The market operator should be informed ideally in advance by the owner of any bull which is not of good temperament or has any behavioural characteristics or condition which may require additional precautions for its safe handling.
3. Stud bulls (meaning all uncastrated bovines which have attained the age of 10 months) may only be driven through a market if there is a route between unloading bays, holding bays, pens, sale ring and loading bays which will ensure that if all reasonable precautions are taken, the bull can be moved safely and under control throughout the market.
4. Bulls must not be secured **solely** by the nose ring, but when they are being led by a nose ring they must be secured and handled in the following manner:—
 - (a) One person using a bull pole attached to the nose ring of the bull and a rope or chain attached to a halter, or head chain, via the nose ring; or
 - (b) Two persons both using ropes or chains, one rope or chain attached to a halter, the other either attached directly to the nose ring or via the nose ring to the halter.
5. Market operators should ensure that bull blindfolds are made available to handlers if their animals require one.

Accommodation

6. All bulls over 10 months of age must be penned individually. An exception to this requirement may be made for bulls which are halter-broken and bulls which are not showing any permanent incisor teeth, have been reared together as a group and are polled, de-horned or disbudded. In these circumstances it should be permissible to pen them together without having to secure them by the head or neck. Such animals should only be penned together (after sale) if they originate from the same group.

7. All gates forming part of a pen, race or barrier should be of adequate strength and construction, and wherever possible interchangeable with any other gate. All hinges and fastenings should be of sound design with a safety device (e.g. post with a cotter pin) and properly maintained to deter release.

8. Bulls should be in pens which are of sufficient strength to contain them. Pen walls and barriers and any passageways along which bulls may pass should be of an adequate height. 5'6" (168 cm) has been shown to be a suitable height and is recommended.