

BVA Parliamentary Briefing
29 October 2013

Slaughter without stunning and food labelling

Summary

The BVA believes that **slaughter without pre-stunning unnecessarily compromises animal welfare** and that animals should be stunned before slaughter. This position is supported by the Federation of Veterinarians of Europe, Farm Animal Welfare Council, Humane Slaughter Association and RSPCA. However, if slaughter without stunning is permitted for religious reasons the BVA believes that any meat or meat products from these sources should be labelled to enable all consumers to make an informed choice.

Background

EU law on slaughter is now contained in Council Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing. The new Regulation (which came into force on 1 January 2013) allows Member States to apply a derogation to permit slaughter without stunning for religious and traditional purposes. (Paragraph 18 of the Regulation's preamble explains the position on religious slaughter).

Meat from animals slaughtered without stunning (through the Shechita method and some Halal methods) currently enters the mainstream food chain without being labelled, leaving consumers without their right to make an informed choice on animal welfare grounds.

There is confusion regarding the terminology used. Although some religious slaughter practices do not allow pre-stunning, others do. For example all of the lamb imported to the UK from New Zealand is Halal but it has also been pre-stunned.

A consultation on new domestic regulations to implement Council Regulation (EC) 1099/2009 in England ended on 24 October 2012 and Defra will introduce new regulations soon. Separate implementing regulations have been laid in Scotland and are soon to be introduced in Wales and Northern Ireland.

Other countries

So far slaughter without prior stunning has been banned in Norway, Iceland, Switzerland, Sweden and Poland. A ban is currently under judicial review in New Zealand. In Germany, abattoirs have to prove the 'religious needs' and number of animals to be slaughtered to satisfy the needs of the religious community concerned before being granted a licence. Finland, Denmark (for cattle only), Austria, Estonia and Slovakia require stunning immediately after the incision if the animal has not been stunned before. Under Australian law, stunning at slaughter is required but there is an option for a state or meat inspection authority to provide an exemption and approve an abattoir for ritual slaughter without prior stunning for the domestic market: post-cut stunning is a requirement for these animals.

Statistics

Complete statistics on religious slaughter are not kept. However, the Food Standards Agency (FSA) published figures in 2012 based on a survey of slaughterhouses in September 2011. The results indicate that the number of animals not stunned prior to slaughter accounts for 3% of cattle, 10% of sheep and goats and 4% of poultry. The FSA was due to carry out another survey in September 2013, the results of which should be available in early 2014.

With the Muslim and Jewish communities comprising just 4-5% of the British population it is clear that a significant proportion of sheep and goat meat from non-stun slaughter is going outside the communities for which it was intended – contrary to EU and UK legislation and largely because it is a convenience to the food sector.

From a welfare perspective individual animals are more important than the tonnage of meat. Non-stun slaughter of sheep and goats increased by 70% between 2003 and 2011 to 1.5 million animals a year and non-stun slaughter of poultry increased 300% in the same period to 32 million.

BVA position

The BVA believes that **slaughter without pre-stunning unnecessarily compromises animal welfare** and that animals should be effectively stunned before slaughter. The Federation of Veterinarians of Europe (FVE)¹ and the Farm Animal Welfare Council (FAWC)² also share this view. Farmed fish should also be stunned. However, as long as slaughter without stunning is permitted for religious reasons the BVA believe that any meat or meat products from these sources should be clearly labelled to enable all consumers to make an informed choice.

In addition the BVA is calling for one clear EU-wide welfare label that takes into account the welfare of animals used in food production from birth to slaughter, including the production system, transport and method of slaughter.

The BVA, together with the Humane Slaughter Association and the RSPCA, state:

- Scientific evidence demonstrates that slaughter without pre-stunning compromises animal welfare.
- Our principle is that all animals should be effectively stunned before they are slaughtered.
- Food derived from animals slaughtered without stunning under the legal exemption should be destined for the consumption by the specific religious communities according to whose beliefs the animals have been slaughtered. The size of these specific markets should determine the amount of non-stunned meat produced. Slaughterhouse operators must be able to demonstrate that the conditions for exemption from stunning are met.
- If Government is not to create a legal requirement for all animals to be stunned before slaughter, but intends to continue to allow an exemption for non-stun slaughter, then we would encourage it to explore a range of alternative options and actions to improve animal welfare and consumer awareness. These are not in order of priority and include:
 - working with Government agencies, the appropriate authorities and stakeholders, to enhance enforcement of existing welfare at slaughter legislation where non-stun slaughter takes place
 - immediate post-cut stunning
 - ensuring sufficient time and facilities for the Official Veterinarian to be able to adequately monitor welfare when non-stun slaughter is taking place
 - educating consumers about animal welfare at slaughter and giving them confidence when buying meat or meat products by:
 - providing them with reliable explanatory information about food labels or logos of assurance schemes that require stunning before slaughter, so they can make informed choices
 - introducing a simple logo for packaging to indicate meat obtained from non-stunned animals, or considering promoting labelling of existing farm assurance schemes which require stunning before slaughter
 - meeting and working with representatives of the relevant religious communities

Option of post-cut stunning

BVA recognises that while pre-stunning is superior in terms of animal welfare, should non-stun slaughter continue to be permitted, post-cut stunning offers a valid means of reducing the suffering of animals at slaughter. Therefore the option of post-cut stunning is not equivalent to pre-cut stunning, but presents a highly desirable refinement if government policy does not change.

In the absence of a proposal to require all animals to be stunned prior to slaughter, BVA believes that in principle some form of statutory legal requirement for immediate post-cut stunning should be introduced for all species by UK governments under the European derogation, for the sake of improved welfare conditions.

¹ http://www.fve.org/news/position_papers/animal_welfare/fve_02_104_slaughter_prior_stunning.pdf

² <http://www.fawc.org.uk/pdf/old/livestock-report-1985.pdf> and <http://www.fawc.org.uk/pdf/old/livestock-report-1985.pdf>

It is acknowledged that the time to loss of brain function in sheep (often within 10 seconds) is significantly shorter than for cattle (often after a minute or more). Meaning bovines tend to benefit more than other species from post-cut stunning. Therefore it is important that suitable procedures and equipment are put in place for other species (as well as bovines), to ensure post-cut stunning is carried out effectively and quickly.

If such a requirement is adopted then it will be necessary to establish a clear definition of what constitutes 'immediate' in terms of the timing and effectiveness of the delivery of a post-cut stun and the type of restraint used.

Labelling stunned and non-stunned meat

The BVA feels it is important to differentiate between 'religious' and 'non-stun' slaughter, particularly for the purposes of labelling. Our concern has nothing to do with the expression of religious belief but with the practice of killing by throat cutting without pre-stunning.

Labelling meat as 'Halal' or 'Kosher' would result in both stunned (Halal) meat being unnecessarily avoided and non-stunned meat still making it into the general food chain. The first problem occurs because in the UK a high percentage of Halal meat comes from animals which have been stunned. The second because the hindquarters of a mammal killed by the Shechita method are not deemed to be Kosher in the UK and would therefore enter the general food chain unlabelled. Meat must be porged to be Kosher, which entails the removal of major blood vessels and nerves. In the UK this is not carried out on hindquarters for commercial and skill reasons, hence a high percentage of meat from animals slaughtered by Shechita enters the general food chain. We therefore advocate that labelling should refer to non-stun slaughter rather than a method of religious slaughter.

The European Parliament supported proposals to label products from non-stun slaughter but agreed to withdraw an amendment on the issue to achieve a consensus on Regulation 1169/2011 on the provision of food information to consumers (July 2011). The Regulation stated that the stunning of animals would be considered in the context of future EU strategy for the protection and welfare of animals in 2012, but the then EU Commissioner for Health and Consumer Policy, John Dalli stated that this 'does not necessarily mean that new legislation will be proposed'.

The EU Commission is currently undertaking a study on the possibility of providing consumers with information on the stunning of animals. Results are expected in April 2014.

What you can do

Support BVA lobbying efforts to ensure future consideration is given to

- reducing the amount of meat from non-stun slaughter entering the mainstream food chain by
 - ensuring it is destined for consumption by those specific religious communities according to whose beliefs the animals have been slaughtered
 - providing consumers with relevant information on the stunning of animals
- improving the welfare of these animals through
 - immediate post-cut stunning
 - enhanced enforcement of existing welfare legislation
 - increased veterinary supervision of the process of non-stun slaughter
- supporting future EU proposals to label all meat and meat products produced from animals slaughtered without prior stunning

Further information

If you require any further information please do not hesitate to contact us via the BVA Media and PR office – Helena Cotton on 020 7908 6340 or helenac@bva.co.uk