

**BVA Parliamentary Briefing**  
**June 2015**

## **Slaughter without stunning and food labelling**

### **Summary**

BVA believes that **slaughter without pre-stunning unnecessarily compromises animal welfare** and that animals should be stunned before slaughter. This position, based on scientific evidence, 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 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 contained in Council Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing. The Regulation (which came into force on 1 Jan 2013) allows Member States to apply a derogation to permit slaughter without stunning for religious and traditional purposes.

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.

Defra introduced new regulations for England implementing Council Regulation (EC) 1099/2009. However, the Welfare of Animals at the Time of Killing (WATOK) Regulations 2014 were revoked by the Government on May 19 2014, the day before they were due to come into force. Separate implementing regulations have been laid in Scotland, Wales and Northern Ireland.

### **Other countries**

Slaughter without prior stunning has been banned in Iceland, Norway, Sweden, Switzerland and, last year, Denmark. A proposed ban in the Netherlands was narrowly overturned in 2013. A ban introduced in Poland in 2013 was overturned in 2014. Austria, Estonia, Finland and Slovakia require stunning immediately after the incision if the animal has not been stunned before. 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. 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. A ban on Shechita slaughter was introduced in New Zealand but then overturned following judicial review; however pre-stunning remains a legal requirement for all Halal meat, so all the lamb exported from NZ is pre-stunned Halal meat.

### **Statistics**

Complete statistics on religious slaughter are not kept. The Food Standards Agency (FSA) published figures in 2012 based on a survey of slaughterhouses in September 2011: those results indicated that 3% of cattle, 10% of sheep and goats, and 4% of poultry were not stunned prior to slaughter. The FSA carried out another survey in September 2013, the results of which were published in January 2015: this survey indicated that 2% of cattle, 15% of sheep and goats, and 3% of poultry were not stunned.

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.

From a welfare perspective individual animals are more important than the tonnage of meat. Non-stun slaughter of sheep and goats increased by 60% between 2011 and 2013 to 2.4 million animals a year. Although there was a 3% decrease in non-stun slaughter of poultry in the same period, this still resulted

in 31 million poultry being killed by this method. Non-stun slaughter of cattle decreased from approximately 82,000 to 44,000 during this period.

### **BVA position**

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)<sup>1</sup> and the then Farm Animal Welfare Council (FAWC)<sup>2</sup> also share this view. Farmed fish should also be stunned. However, as long as slaughter without stunning is permitted for religious reasons BVA believes that any meat or meat products from these sources should be clearly labelled to enable all consumers to make an informed choice.

In addition 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.

BVA has developed a joint statement of principles with the Humane Slaughter Association and the RSPCA stating that all animals should be effectively stunned before they are slaughtered<sup>3</sup>.

### **Scientific evidence examples:**

- Farm Animal Welfare Council (2003): *“When a very large transverse incision is made across the neck a number of vital tissues are transected including: skin, muscle, trachea, oesophagus, carotid arteries, jugular veins, major nerve trunks (e.g. vagus and phrenic nerves) plus numerous minor nerves. Such a drastic cut will inevitably trigger a barrage of sensory information to the brain in a sensible (conscious) animal. We are persuaded that such a massive injury would result in very significant pain and distress in the period before insensibility supervenes.”*
- The EU-funded Dialrel project (2006-2010) (von Holleben and others 2010): *“It can be stated with high probability that animals feel pain during and after the throat cut without prior stunning. This applies even to a good cut performed by a skilled operator, because substantial tissue damage is inflicted to areas well supplied with nociceptors and subsequent perception of pain is not exclusively related to the quality of the cut.”* Also that *“neck cutting without stunning poses the highest risk for the cut and during bleeding imposes extra manipulation to the animal. Additionally pain, suffering and distress during the cut and bleeding are highly likely”*.
- European Food Safety Authority (2004): *“The animals which are slaughtered have systems for detecting and feeling pain and, as a result of the cut and the blood loss, if not stunned, their welfare will be poor because of pain, fear and other adverse effects. The cuts which are used in order that rapid bleeding occurs involve substantial tissue damage in areas well supplied with pain receptors. The rapid decrease in blood pressure which follows the blood loss is readily detected by the conscious animal and elicits fear and panic. Poor welfare also results when conscious animals inhale blood because of bleeding into the trachea. Without stunning, the time between cutting through the major blood vessels and insensibility, as deduced from behavioural and brain response, is up to 20 seconds in sheep, up to 25 seconds in pigs, up to 2 minutes in cattle, up to 21/2 or more minutes in poultry, and sometimes 15 minutes or more in fish.*
- Defra/NZ MAF research study (Gibson and others 2009): looked at the effect of slaughter without prior stunning on calves, and concluded that the animals live for approximately two minutes after the ventral neck incision. From abstract: *Consciousness, and therefore the ability of the animal to feel pain and experience distress after the incision, may persist for 60 seconds or longer in cattle. These observations suggest that livestock may experience pain and distress during the period before they become unconscious (insensible).*

### **BVA e-petition and Westminster Hall debate**

A parliamentary [Westminster Hall debate](#), led by Philip Hollobone MP, was held on 23 February 2015 to consider BVA's e-petition to 'end non-stun slaughter to promote animal welfare'. The e-petition, which closed on 30 March 2015, reached nearly 120,000 signatures.

### **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

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<sup>1</sup> [http://www.fve.org/news/position\\_papers/animal\\_welfare/fve\\_02\\_104\\_slaughter\\_prior\\_stunning.pdf](http://www.fve.org/news/position_papers/animal_welfare/fve_02_104_slaughter_prior_stunning.pdf)

<sup>2</sup> <http://webarchive.nationalarchives.gov.uk/20110615095037/http://www.fawc.org.uk/reports.htm>

<sup>3</sup> [http://www.bva.co.uk/uploadedFiles/Content/News\\_campaigns\\_and\\_policies/Policies/Ethics\\_and\\_welfare/BVA-RSPCA-and-HSA-statement-on-welfare-at-slaughter.pdf](http://www.bva.co.uk/uploadedFiles/Content/News_campaigns_and_policies/Policies/Ethics_and_welfare/BVA-RSPCA-and-HSA-statement-on-welfare-at-slaughter.pdf)

animals at slaughter. Therefore the option of post-cut stunning is not equivalent to pre-cut stunning, but presents a desirable refinement if government policy does not change.

### **Labelling stunned and non-stunned meat**

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 not assist consumers because not all 'Halal' slaughter is non-stun and not all meat from Shechita slaughter is able to enter the Kosher market (as the hindquarters of a mammal killed by the Shechita method are not deemed to be Kosher in the UK and therefore enter the general food chain unlabelled). 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. The EU Commission Directorate General for Health and Food Safety undertook a [Study on Information to Consumers on the Stunning of Animals](#) (published May 2015) which found that 72% of consumers in the survey want information of stunning of animals when buying meat.

#### **What you can do**

1. Support BVA's position by calling for an end on non-stun slaughter
2. But, while slaughter without stunning is still permitted for religious reasons, support BVA's call for any changes that:
  - reduce the amount of meat from non-stun slaughter entering the mainstream food chain
  - provide consumers with relevant information on the stunning of animals
  - improve the welfare of animals at slaughter through immediate post-cut stunning and increased veterinary supervision of the process of non-stun slaughter

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