

Slaughter Without Pre-Stunning

Over one billion terrestrial farm animals are killed every year in the UK for meat. Many of these animals are killed by having their throats cut and the vast majority are stunned - rendering them unconscious - before this is done. However, the law permits Jewish and Muslim communities to slaughter animals according to their religious beliefs, which can involve slaughtering the animals without stunning them first. Whilst the RSPCA acknowledges that due to the religious association of this practice this can be a sensitive issue, it firmly holds the view that all animals should be treated humanely at the time of killing and therefore be stunned prior to slaughter.

WHAT IS RELIGIOUS SLAUGHTER?

In the UK, the Jewish and Muslim communities are exempt from a section of the law - *The Welfare of Animals at the Time of Killing Regulations 2015* - that requires all animals to be stunned before they are slaughtered. This requirement does not apply for sheep, goats, bovine animals (cattle) or birds being killed in accordance with religious rites. Stunning is a process that causes animals to lose consciousness, making them insensible to pain and suffering prior to being killed.

Although there are differences in the way animals are slaughtered by the Shechita (Jewish) and Halal (Muslim) methods, both involve cutting the animal's throat with a knife, which can be undertaken without stunning, i.e. whilst the animal is still fully conscious. The teachings of the Jewish and Muslim religions state that an animal must be fully alive before it is slaughtered.

Accordingly, the stunning of an animal before slaughter may be interpreted as not being compliant with such religious teachings.

Within both Jewish and Muslim communities, there are different interpretations of the religious laws. Leaders of some liberal branches of the Jewish faith are prepared to interpret Jewish law in the light of modern customs and knowledge, but others are not. Similarly, some Muslim leaders do not consider that stunning before slaughtering transgresses the laws laid down in the Koran - the Muslim holy book. Other Muslim leaders see it as an offence against law and tradition.

NUMBER OF ANIMALS SLAUGHTERED BY RELIGIOUS METHODS

In August 2022, the Food Standards Agency (FSA) published data¹ that included new statistics on the number of animals in England and Wales that were slaughtered for religious purposes (Shechita and Halal) without being stunned. The data was collected over a two week period, in March 2022. It revealed that **22% of sheep, 25% of goats, 8% of poultry and 1% of cattle did not receive a pre-slaughter stun**. This means that, **in total, the vast majority of these animals were stunned prior to slaughter**. These new statistics suggest there has been little change in the number of animals being slaughtered without pre-stunning since 2018. However, it's important to note that the FSA data was collected over a limited period. This means the annual figures could be significantly different – greater or smaller – than those stated above.

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LAWS GOVERNING RELIGIOUS SLAUGHTER

'The Welfare of Animals at the Time of Killing Regulations 2015' sets out specific requirements for the slaughter of animals by the Jewish and Muslim methods. These Regulations implement European Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing. The Regulation states that, amongst other things:

the animal's throat must be cut by rapid, uninterrupted movements of a hand-held knife;

both carotid arteries and both jugular veins must be severed;

the knife used to slaughter the animal must be inspected immediately before killing to ensure it is undamaged and of sufficient size and sharpness to kill that animal in the manner described in the first bullet point, above.

Further, religious slaughter can only take place in a licensed slaughterhouse. This requirement was initially added as an amendment to previous legislation.

Key Welfare Issues

SLAUGHTER WITHOUT PRE-STUNNING

In June 2003, the Government's independent advisory body, the Farm Animal Welfare Council (FAWC) published its report on the *'Welfare of Farmed Animals at Slaughter or Killing – Part 1: Red Meat Animals'*. In undertaking a comprehensive review of all red meat slaughter methods, including religious slaughter practices, members of the FAWC considered evidence from many individuals and organisations, including religious and animal welfare groups, as well as observing the various methods of slaughter for themselves.

Their report focused on three particular animal welfare issues with regard to slaughter without pre-stunning. These were:

pre-slaughter handling;

the potential for pain and distress during exsanguination (blood loss);

the time to loss of brain responsiveness.

On the first of these issues, FAWC concluded that the level of restraint required to sufficiently expose the throat of the animal, perform an effective neck cut, and hold the animal still until it had bled out, was far greater than that needed for conventional slaughter.

With regard to the potential for pain and distress, FAWC considered the representations it had received - some of which had argued that a neck cut is not painful provided it is performed as a rapid, uninterrupted movement with a sharp knife. However, FAWC came to the view that when a large transverse incision is made across the neck, a number of vital tissues are transected including: skin, muscle, the trachea, the oesophagus, carotid arteries, jugular veins, major nerve trunks, plus numerous minor nerves. They concluded that such a drastic cut would inevitably trigger a barrage of sensory information to the brain in a sensible (conscious) animal. FAWC stated that: *"we are persuaded that such a massive injury would result in very significant pain and distress in the period before insensibility supervenes"*.

Concerning the time taken to loss of brain responsiveness, FAWC considered the available evidence and concluded that adult cattle can take between 22 and 40 seconds to become insensible (unconscious) after neck cutting. FAWC also cited work on calves that had shown variation in the period to insensibility from 10 to 120 seconds, with the longer times a result of occlusion of the carotid arteries.

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Occlusion is observed in a proportion of cattle, and particularly in calves, and occurs when the carotid arteries contract after the cut has been made. This seals the cut ends which causes blood pressure within the brain to be maintained.

FAWC's recommendations on this issue were that, "*Council considers that slaughter without pre-stunning is unacceptable and that the Government should repeal the current exemption,*" and that, "*Until the current exemption which permits slaughter without pre-stunning is repealed, Council recommends that any animal not stunned before slaughter should receive an immediate post-cut stun*".

In 2005, the Government issued its final response to the FAWC's 2003 report in the form of a consultation document. The accompanying statement indicated that the Government was not intending to adopt the FAWC's recommendation to repeal a current legal exemption allowing Halal and Kosher meat to be produced in the UK without the animals being stunned, but that it may consider the issue of labelling of meat (see below) from such slaughter methods – on a voluntary basis. The RSPCA responded to the Government's consultation, urging it to consider more carefully the animal welfare implications of allowing the practice of slaughter without pre-stunning to continue, and pressed for the compulsory labelling of meat from animals slaughtered in this way. However, the Government again stated that it would not change the law and that slaughter without pre-stunning would continue to be permitted for Jewish and Muslim groups.

Research undertaken in New Zealand (Gibson et al., 2009) has provided further evidence of the welfare problems associated with neck cutting of conscious animals. The work showed that brain signals in calves indicate that they do appear to feel pain when slaughtered without pre-stunning. A pain signal lasting for up to 2 minutes was detected following neck cutting. The researchers also showed that when the animals are concussed through

stunning, brain signals corresponding to pain disappear.

LABELLING OF MEAT FROM ANIMALS SLAUGHTERED BY RELIGIOUS METHODS

It has been estimated that less than half of the meat from animals slaughtered by the Jewish method is sold in Kosher shops. The consumption of certain parts of the animals' hindquarters such as veins, lymphatic and sciatic nerve and its branches, is forbidden under Jewish law. To remove them is a specialised task, which has not been practised in the UK since the 1930s. Consequently, all hindquarters are rejected as not Kosher, as are many carcasses which cannot be consumed as Kosher meat for other reasons (for example, damage to the carcass). A high proportion of the meat which is declared non-Kosher is therefore sold on the open market but is not labelled as meat from animals that have been slaughtered without pre-stunning. Also, it is currently not possible to tell whether meat simply labelled 'Halal' comes from animals that have been pre-stunned or not before slaughter.

A previous FAWC report (1985) on religious slaughter highlighted this issue, and recommended that all meat from animals slaughtered by religious methods, and offered for sale "*...should be clearly labelled to indicate the method of slaughter*". However, the law has not been changed to give effect to this recommendation. In its response to the FAWC Report, made in March 2005, the Government indicated that it would be willing to discuss the issue of labelling with various stakeholder groups.

In 2010, during the European Parliament's First Reading (consideration) of the Commission proposal for a Food Information Regulation, the Parliament proposed that meat from animals slaughtered without stunning should be labelled.

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In relation to this, in 2011 the then UK Agriculture Minister James Paice stated to the House of Commons: *"We believe people should know what they are buying in shops or when they are eating out, and I have had discussions with the supermarkets, the food and catering industries about the role labelling and a point of sale information can play in giving consumers a greater choice. All agree this is a difficult, complex and sensitive issue that cannot be easily resolved in view of the many competing interests involved. We will be looking at this further but, will need to consider the impact of the existing EU meat labelling Regulations, before any final decisions are taken²."* This issue has not progressed to date, except that in 2013 the European Commission undertook a study on information to consumers on the stunning of animals and concluded that, *"...for most consumers information on pre-slaughter stunning is not an important issue unless brought to their attention³."* And that, *"It is by no means clear that consumers would actually act on this information if it were to be available³."*

Work of the RSPCA on this issue

The RSPCA is opposed to the slaughter of any farm animal without first rendering it insensible to pain and distress until death supervenes. We believe that all animals should be treated humanely at the time of killing and therefore be stunned prior to slaughter. Scientific research has clearly demonstrated that slaughter of an animal without stunning can cause unnecessary suffering.

We continue to press for changes in legislation that would improve the welfare of these animals at the time of slaughter. Until this occurs, the RSPCA proposes that:

The Jewish and Muslim communities in the UK should review their slaughter practices. In New Zealand, for example, all animals slaughtered by the Halal method are stunned before slaughter and all animals slaughtered by the Kosher method are stunned shortly after the incision is made

in the animal's neck. The progress already made in the UK in these areas should be extended to cover all animals slaughtered.

All meat produced from animals that have not been stunned before slaughter should be carefully labelled in some way, so that it can be easily identified by consumers. The RSPCA believes that consumers have the right to choose whether or not they wish to buy meat from animals slaughtered without pre-stunning.

Recommended further information

- FAWC report on 'The Welfare of Farmed Animals at Slaughter or Killing – Part 1: Red Meat Animals' (2003).
- FAWC report on 'The Welfare of Livestock when Slaughtered by Religious Methods' (1985).
- Gibson, T.J., Johnson, C.B., Murrell *et al.* (2009) New Zealand Veterinary Journal. 57:77-85.
- Food Standards Agency (2017) Food Standards Agency Board Meeting – 20 September 2017: Animal Welfare Update. Great Britain: Food Standards Agency.

¹Defra (2022) Results of the 2022 FSA Slaughter Sector Survey in England and Wales August 2022

²HC Deb 28 February 2011 c62W

³European Commission Directorate General for Health and Food Safety (2015) Study on information to consumers on the stunning of animals. Brussels: Food Chain Evaluation Consortium

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How you can help!



If you eat meat, eggs or dairy products and are concerned about welfare then look out for products carrying the RSPCA Assured logo. RSPCA Assured is the RSPCA's farm assurance and food labelling scheme that aims to ensure animals are reared, handled, transported and slaughtered/killed according to strict RSPCA welfare standards, developed by the RSPCA. The RSPCA welfare standards are informed by scientific evidence and practical experience.

If more consumers insist on higher welfare products, more supermarkets will want to stock them, which will encourage more farmers, hauliers and abattoirs to improve their practices and ultimately more farm animals will benefit.

Take part in the RSPCA's campaigns for farm animals by visiting www.rspca.org.uk/campaigns.

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