Improving the welfare of farm animals at the time of their death:
The campaign to end non-stun slaughter
**The science**

Scientific evidence clearly indicates that non-stun slaughter can cause unnecessary suffering.

A Farm Animal Welfare Council report on the welfare of farmed animals at slaughter or killing concluded that animals that are not stunned suffer ‘...very significant pain and distress in the period before insensibility supervenes’.

When an animal is not stunned before slaughter, the neck cut triggers a barrage of sensory information to the brain in the conscious animal.

Only after prolonged blood loss will the animal become unconscious and insensitive to pain. According to EFSA guidelines, the time taken for animal brains to lose responsiveness is:

- sheep – up to 20 seconds
- cattle – up to 2 minutes
- poultry – up to 2.5 minutes.

A 2010 EU report on slaughter practices states: ‘There is a critical period after the incision, during which an unstunned animal may temporarily perceive pain and distress before it becomes irreversibly unconscious due to severe blood loss’.

**Electro-immobilising in poultry**

With regards to poultry, some halal slaughterhouses use a water bath method to stun poultry in accordance with religious rites involving electrical currents, which would not fall within the legal parameters required for conventional slaughter. In these cases, some birds may be electro-immobilised, resulting in them still being conscious when they are killed. This type of stun, which can be ineffective, is recorded within the 2018 Food Standards Agency report as a ‘non-stun’. For other species such as cattle and sheep, there are clear legal parameters to apply a pre-stun for religious rites.

**The law and exemptions**

The EU Regulation on the Protection of Animals at the Time of Killing came into force in the UK in 2015. This law states that animals must be stunned (rendered insensible to pain) before they are slaughtered. However, an exemption allows sheep, goats, cattle and poultry to be slaughtered without pre-stunning for religious purposes.

By law, stunning must render an animal immediately unconscious. Methods of stunning include:

- mechanical stun – e.g. using a captive bolt
- electrical stun – e.g. electrical stun tongs and electric water bath
- gas stun – e.g. use of carbon dioxide.

The Regulation also sets the parameters for the application of a stun e.g. the electrical current and voltage, to ensure the stun is sufficient and that the animal is insensible (unconscious) until death supervenes.

Slaughter legislation in the UK is devolved to the governments of England, Wales, Scotland and Northern Ireland. Each country implements its own ‘Welfare at the Time of Killing’ (WATOK) regulations and provides exemptions permitting the non-stun slaughter of animals for Jewish and Muslim communities.

EU law does not prohibit a member state from banning slaughter without pre-stunning or making improvements to slaughter regulations. Indeed many countries and regions have prohibited non-stun slaughter, including Wallonia, Slovenia, Denmark, Latvia and Flanders. At present, there is no commitment from the UK governments to end non-stun slaughter after Brexit.

Furthermore, Regulation 1099/2009 which builds on previous Regulation 93/119 states that “provisions applicable to religious slaughter have been transposed differently depending on national contexts...” Based on this, our interpretation is that national context should mean the domestic market and not include the import requirements of another member state or a third country market.

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2 European Food Safety Authority. (2014). Opinion of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals.
All figures referenced in this report relate to the 2018 Food Standards Agency Survey into Slaughter Methods in England and Wales.

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Over a billion farm animals (excluding fish and crustaceans) are killed each year in the UK. Over 94 million of these animals are killed without being pre-stunned, due to the legal exemption for religious purposes.

Farm animals killed in the UK:

- 936.6 million broiler (meat) chickens
- 41.7 million egg laying hens
- 12.7 million sheep
- 9.1 million pigs
- 7.6 million turkeys
- 1.9 million cattle and calves
- 20 thousand goats

Number of farm animals in England subjected to non-stun:

Breakdown by species:

- 90.8 million broiler chickens (97%)
- 3.1 million sheep (35%)
- 584 thousand egg laying hens (14%)
- 38 thousand turkeys (0.5%)
- 30 thousand other poultry (0.2%)
- 22 thousand cattle and calves (1%)
- 1.5 thousand goats (0.5%)

Non-stun slaughter and trade

Sheep meat is the only non-stunned meat being exported outside of the UK. 24% of the meat from the 3.1 million sheep not stunned is being exported.

762,231 UK sheep killed by non-stun slaughter were destined for meat export.

None of the governments within the UK have a legal requirement that ensures all animals are stunned before slaughter. However, all animals currently slaughtered in Scotland, Northern Ireland and Wales are being stunned before slaughter.

Non-stun slaughter for religious purposes

In the UK, Jewish and Muslim communities are exempt from legal requirements to stun animals before slaughter. Shechita (Jewish) and Halal (Muslim) slaughter methods can involve cutting the animal’s throat with a very sharp knife, often without pre-stunning.

Halal labelled meat

Traditional halal meat is killed by hand and must be blessed by the slaughterer. It is permissible under some readings of Islamic law for animals to be pre-stunned. However, some sections of the Muslim community do not accept an animal as ‘Halal’ if it has been stunned. A traditional method of halal slaughter doesn’t involve a stun, and requires a deep incision with a sharp knife on the neck that cuts the jugular vein. According to the 2018 FSA Animal Welfare Survey, a larger proportion of halal certified meat comes from animals that have been pre-stunned.

218 million animals killed by halal slaughter

58% were pre-stunned in line with EU parameters (126 million animals)

42% were not pre-stunned or were poultry that were ineffectively stunned (91.8 million animals)

All animals slaughtered for halal were accepted and the meat was certified for religious consumption.

Kosher labelled meat

Jewish slaughter, known as shechita, involves a ‘Shochet’ who performs the slaughter and is trained in Jewish law. A special knife called a chalaf is used which has to be extremely sharp to achieve the desired cut. No animals killed for kosher receive a stun.

2.9 million animals killed by kosher slaughter

None of these animals were pre-stunned.

90,500 animals, mostly broiler chickens, were rejected as being unfit for religious consumption and may have entered the food supply unlabelled.

The FSA report states that: “It is unclear whether or not hind quarters [from animals killed for kosher certified meat] are generally sent on for wider consumption.” Therefore, meat from tens of thousands of rejected animals and the unused hind quarters of accepted animals being killed using non-stun methods could be packaged and unlabelled and sold to unsuspecting consumers as conventional meat.

Religious slaughter and animal welfare can work together. For example, some Muslim communities both in the UK and abroad accept the stunning of animals before slaughter as Halal.

Sufficient supply for the demand

We believe that the spirit of the law is to limit the number of animals subjected to religious slaughter to be sufficient only to meet the demand of the local (national) religious communities. The UK governments at present do not share this view and meat from non-stunned animals is currently being exported to other countries.

Furthermore, some councils, such as Kirklees in West Yorkshire, have a blanket policy to serve non-stunned halal meat in their schools, therefore failing to ensure that non-stunned meat is served only to the communities the exemption is in place for. Other councils such as Lancashire, have a policy to not provide non-stunned meat in their schools.
Myths and FAQs

Myth: Only religious slaughter involves cutting an animal’s throat.
Killing an animal by throat cutting (also known as ‘sticking’) is not exclusive to slaughter for religious purposes; it is a practice used to bleed out and kill the vast majority of cattle and sheep in the UK. However, pre-stunning ensures the animal is unconscious when the neck is cut so the animal does not suffer.

Myth: The neck cut is just like a stun
A stun is a process that results in the immediate loss of sensibility (consciousness) in the animal. Religious groups claim that the neck cut serves as a stun. However, after neck cutting there is a period of time before the animal loses consciousness. Therefore, the scientific evidence shows that a neck cut is not consistent with an animal immediately losing consciousness and, as such, cannot be considered a form of stunning.

Myth: Religious meat is cruel and needs to be banned
There doesn’t necessarily need to be a ban on meat that is important to religious communities to ensure farm animals receive a more humane death. A proportion of halal meat comes from animals that have been pre-stunned and certified as halal, which highlights that more humane slaughter practices and religious requirements can work together. However, all kosher certified meat for the Jewish community comes from animals that have not been pre-stunned.

FAQ: But aren’t all the animals stunned for religious meat just paralysed – it’s not an effective stun?
The legislation concerning the killing of farm animals does not make reference to any stunning parameters that must be used for poultry killed in accordance with religious rites. Such an omission leaves this important area – which has a significant impact on poultry welfare at a critical time – unregulated. It is possible that those parameters being used could result in the animals being electrically immobilised and conscious rather than effectively stunned. For those slaughterhouses using stunning parameters that don’t meet the EU regulations, the Food Standards Agency is now recording this as a ‘non-stun’. For other species such as cattle and sheep, there are clear parameters to apply a pre-stun.

Worldwide progress
Non-stun slaughter is illegal in Denmark, Malta, Slovenia, Sweden, Cyprus, Finland, Luxembourg, Switzerland, Norway, Iceland and Wallonia and Flanders in Belgium. We strongly urge the governments in the UK to follow these examples.

New Zealand has never permitted the slaughter of animals without stunning. Despite this, they have a successful meat export trade to Muslim countries, such as Saudi Arabia, Indonesia, Malaysia and the Gulf Cooperation Council. Australia does allow a small number of poultry and sheep to be slaughtered without pre-stunning for local Jewish consumption only, but these animals receive a post-cut stun, which reduces the period of consciousness. Meat from these animals can be exported to New Zealand if required.

In Germany abattoirs must apply for a licence if they wish to perform non-stun slaughter for religious exemptions. The licence will determine the number of animals which are permitted to be slaughtered using this method. This aids traceability should the actual number involved exceed the amount stated on the licence.

72% of UK consumers want to know the method of slaughter for the meat products they eat.

Mellor, D.J., et al. 2009 A re-evaluation of the need to stun calves prior to slaughter by ventral neck incision: An introductory review. New Zealand Veterinary Journal 57, 74-79
All animals should be stunned before slaughter.

Whilst this practice continues and until there is a change in the law to end non-stun slaughter, we call on the governments in the UK to urgently implement the following measures:

1. Ensure supply goes to the intended communities
   Stricter measures are needed to ensure that the supply of meat from non-stunned animals matches the demand from the local communities that the derogation is intended to serve only.

2. End the export of meat from non-stun slaughter
   The export of meat from non-stunned animals must be prohibited as a practice that is not in the spirit of the current legislation. The export of non-stun meat must be prohibited as a practice that is not in the spirit of the current derogation to provide food for the consumption of the UK’s religious communities. Germany has banned the export of non-stunned meat.

3. Ensure greater transparency
   There must be a system in place which records and regularly reports on the number of animals which have not received an effective stun, those who have not received any stun and the amount of non-stun meat that is exported.

4. Introduce method of slaughter labelling
   All meat from animals that have not been stunned must be clearly labelled. This will enable consumers to fully understand the choice they are making when purchasing such products.

5. Move to post-cut stunning
   We recognise that while pre-stunning is superior from a welfare point of view, should non-stun slaughter continue to be permitted, post-cut stunning should be required to reduce the period of suffering.

Support the campaign

Get involved in the campaign by visiting www.rspca.org.uk/endnonstun and join the online debate using #EndNonStun