



Rt Hon Michael Gove MP
Secretary of State for Environment, Food and Rural Affairs
Defra
4th Floor, NE Corner
Seacole Building
2 Marsham Street
London
SW1P 4DF

Friday 1st February 2019

Dear Secretary of State,

Regarding the exemption to allow the slaughter of animals without pre-stunning

Farm animals are sentient beings - they have the capacity to suffer and feel pain. This must be taken into account throughout their life, including at the time of slaughter.

Scientific evidence clearly indicates that slaughter without pre-stunning can cause unnecessary suffering. The level of restraint required to hold an animal still, expose the throat, and perform an effective neck cut is typically greater than that needed for stunned slaughter. When the neck cut is performed it triggers a barrage of sensory information to the brain in the conscious animal.

The Farm Animal Welfare Council report, 'The welfare of farmed animals at slaughter or killing' stated: *"We are persuaded that such a massive injury would result in very significant pain and distress in the period before insensibility supervenes"*.

Clearly, the legal requirement to stun animals prior to slaughter is underpinned by the fact that a stun is an essential prerequisite to safeguard the welfare of all animals at the time of killing. Indeed, it is the UK Government's stated position that they would prefer all animals to be stunned before slaughter.

Stunning before slaughter ensures animals are unconscious and therefore do not feel pain or suffer unnecessarily at the time of killing, We therefore call on the UK Government to retract the derogation that permits the unnecessary suffering of animals at the time of killing, from the Welfare of Animals at the Time of Killing Regulations for England and in turn require all animals to be effectively stunned prior to slaughter.

All animals should be stunned before slaughter. No exceptions.

Furthermore, in your letter to the BVA President, on 28 August 2018, you stated your intent to publish the results of the FSA survey of all slaughterhouses in England in the autumn of 2018. Now in the first quarter of 2019, we note with concern the continued absence of these survey results from the public domain. As the UK negotiates further trade deals, it is paramount that the UK Government provides timely and transparent information regarding volumes of meat arising from different slaughter methods, as well as the level of exports.

Whilst this practice continues and until such a ban is enforced, we call on the UK Government to urgently implement the following measures:

1. Require an immediate post-cut stun for cattle, sheep, goats and deer

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 offers a valid means of reducing the suffering of animals at slaughter. Although this is not a satisfactory resolution it presents a highly desirable refinement while government policy on non-stun slaughter remains.

2. Ensure supply meets demand

The current legal derogation states that animals that are not stunned before slaughter should be slaughtered in accordance with religious rites, for consumption by Jews or Muslims. It is therefore in the spirit of the legislation that the number of animals slaughtered according to religious rites is sufficient only to meet the demand of local religious communities. Stricter measures are needed to ensure that the supply of meat not stunned before slaughter matches the demand from the local communities that the derogation is intended to serve. For example, Germany requires that abattoirs apply for a licence by defining the number of animals to undergo non-stun slaughter to meet local demand only.

More recently, on 1 January 2019 the Flanders region of Belgium, introduced legislation to ban non-stun slaughter. The Brussels region, which has the largest Muslim population will remain the only region that will allow abattoirs to practise non-stun slaughter in line with Islamic halal and Jewish kosher rituals.

3. End the export of meat from non-stun slaughter

Currently there is lack of clarity as to how much meat the UK is exporting from non-stun animals. 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.

4. Ensure greater transparency

To ensure that the current legislation is effective in its aims of safeguarding animal health and welfare and providing food for the consumption of religious communities, there must be robust and regular reporting on the numbers of animals not receiving an effective stun, are receiving no stun and the amount of non-stun meat that is exported. We therefore call on the Government to release the results of the FSA survey of all slaughterhouses without delay.

5. Introduce method of slaughter labelling

Some animals that are intended for the markets serving religious communities do not reach the required standards demanded by these communities for a number of reasons: for example, the knife may have been damaged during the process or the meat from the hindquarters may not be considered kosher. This then leads to the animal, or animal part, being rejected for consumption by the religious community and, as a result, the animal is likely to enter the mainstream supply chain and conventional market. If slaughter without stunning is still to be permitted, then any meat or fish from this source must be clearly labelled. This will enable consumers to fully understand the choice they are making when purchasing such products.

We welcome the opportunity to meet with you to discuss this further and a meeting can be arranged via: publicaffairs@rspca.org.uk.

We look forward to hearing from you on this matter.

Yours sincerely,



SIMON DOHERTY
BVA President



CHRIS SHERWOOD
RSPCA CEO