



Religious Slaughter of Animals

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Summary

There has been growing public and parliamentary focus in the last year on methods used for religious slaughter, welfare concerns about whether animals are stunned before slaughter, which food outlets are serving halal meat as a matter of course to all customers, and whether all meat prepared by halal and kosher methods is being labelled as such.

UK and EU slaughter regulations set minimum welfare standards at slaughter and require all animals to be pre-stunned before slaughter to minimise their suffering. Member States may exempt slaughter in accordance with religious beliefs from the pre-stunning requirement and the UK implements this derogation.

The Government has said that it would prefer all animals to be pre-stunned before slaughter on welfare grounds but it observes the rights of religious communities and the Prime Minister has said he will never ban religious slaughter practices. For animal slaughter to be lawful under Jewish law and Shariah (Islamic) law, Jewish (Shechita) and Muslim (Halal) conditions have to be met before an animal is cut and bled. These conditions also dictate how, and whether, pre-stunning of animals is acceptable. Around 80% of meat in the UK prepared by the Halal method is pre-stunned, including supermarket own-brand meat.

The British Veterinary Association (BVA), RSPCA, and Compassion in World Farming have had long running campaigns against slaughter without stunning arguing that the scientific evidence, shows that non-stun slaughter allows animals to perceive pain and compromises welfare. However, faith communities counter that, when carried out properly, their slaughter methods are more humane. The BVA instigated an [e-petition](#) in May 2014 on this matter and it has already had over 114,000 signatures triggering a Commons Debate. A counter petition, calling for the protection of the right to non-stun religious slaughter, has 38,000 signatures.

The All Party Parliamentary Group for Beef and Lamb's August 2014 report [Meat Slaughtered in Accordance with Religious Rites](#) highlighted areas of research that would better support the evidence-base for policy-making in this area as well as future slaughter practices. All sides agree that method-of-slaughter labelling would help the consumer to decide whether they want to buy non-stun meat. The UK Government is now awaiting a delayed EU Commission report on animal welfare labelling.

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1 Methods of religious slaughter

For animal slaughter to be lawful under Jewish law and Shariah (Islamic) law, Jewish (Shechita) and Muslim (Halal) conditions have to be met before an animal is cut and bled. For both religions the animal needs to be considered alive before the procedure and both have welfare requirements such as ensuring that the animal does not experience undue suffering (halal) and does not feel any pain (Schechita). These requirements dictate how and whether the pre-stunning of animals is acceptable before slaughter for these faiths.

In the UK, in practice around 80% of animals undergoing Halal slaughter *are* actually stunned as per other slaughter as certain stun methods (not captive-bolt) are accepted by a number of halal certification bodies for certain species.¹ However, any stunning is considered 'injuring' the animal in Jewish Law and is not permitted.

1.1 Shechita²

Shechita is the Jewish method of slaughtering animals and poultry for food. It is the only method of producing kosher meat and poultry allowed by Jewish law. Jewish law prohibits pain to be caused to animals and requires that an animal intended for food must be healthy and uninjured at the time of slaughter. Therefore stunning, by captive-bolt or electricity, renders an animal forbidden to Jews for food. It is also forbidden to slaughter an animal in front of other animals or to slaughter an animal and its young on the same day. A Jew is also obligated to relieve an animal's suffering.³

[Shechita UK](#) is a community-wide campaign that unites representatives from the Board of Deputies of British Jews, the National Council of Shechita Boards, the Union of Orthodox Hebrew Congregations and the Campaign for the Protection of Shechita. It incorporates representatives from all the Kashrus Authorities in the UK.

Schechita UK has been established to promote awareness of and education about this Jewish method of slaughter and explains that there is no ritual in the process and the slaughter is carried out as follows:⁴

The procedure consists of a rapid and expert transverse incision with an instrument of surgical sharpness (a chalaf), which severs the major structures and vessels at the neck. This causes an instant drop in blood pressure in the brain and immediately results in the irreversible cessation of consciousness. Thus, shechita renders the animal insensible to pain, dispatches and exsanguinates in a swift action, and fulfils all the requirements of humaneness and compassion.

Shechita is normally performed while the animal is lying on its back, but this is not allowed in the UK. A shochet performs the shechita. Shochetim are highly trained over a number of years in animal anatomy, pathology and welfare. They are licensed every 12 months by the

¹ Food Standards Agency, [Results of the 2011 FSA animal welfare survey in Great Britain](#), 22 May 2012

² GOV.UK, [Slaughter of Livestock: Welfare Regulations](#) as viewed on 7 May 2014

³ Shechita UK, [Facts about Shechita](#), 30 November 2009

⁴ Shechita UK, [A guide to Shechita](#), May 2009 p.3

Rabbinical Commission for the Licensing of Shochetim and must also be licensed by the local authority where they practise.⁵

Trends in the UK kosher market

The number of identifying Jews in England and Wales has risen slightly over the past decade. The 2011 census found that, 263,346 people answered “Jewish” to the voluntary question on religion, compared with 259,927 in the previous count of 2001.⁶ Two thirds of UK Jews are London-based whilst other significant Jewish communities are in Manchester, Leeds, Liverpool, Glasgow and Birmingham.

A 2008 information note by [Scotland Food and Drink](#) indicates that until fairly recently kosher products tended to be found in independent delicatessens and specialist stores. However, retail multiples are now selling a considerable number of kosher lines.⁷

A report for the EU DIALREL project in 2010 (encouraging dialogue on religious slaughter) prepared by researchers from Cardiff University, [The development of halal and kosher meat markets in the UK](#) also described this trend and observed that the kosher market was relatively stable compared with the rapidly growing halal market (see below).

1.2 Halal

According to the Islamic Law (Shariah), unless the Halal (Lawful) animals are slaughtered ritually, their meat does not become Halal for Muslims. The Halal.Markets.Net (which facilitates trade and investment in Halal products) summarises the guidelines for the method of slaughter for Muslims based on the Holy Quran, the Sunnah and the traditions of the Sahabah (Companions of the Prophet) on its website (the Zibah method).

These conditions also require certain words to be said but in terms of how the animal is killed the key elements are as follows:⁸

- All animals to be slaughtered must be the ones permitted for consumption under the Islamic law e.g. cow, sheep, lamb, poultry etc.
- Slaughtering must be performed manually by a mature Muslim who fully understands the fundamentals and conditions relating to slaughtering according to the Islamic Law.
- The animal should be slaughtered using a very sharp knife, penetrating the throat of the animal.
- Windpipe, food-tract and two jugular veins should be cut, preferably in one stroke.
- The blood of the slaughtered animal must be drained as completely as possible.
- The neck of the animal should not be disjoined during slaughtering intentionally, even the knife should not go deep into the spinal marrow.
- Slaughtering from the back of the neck is not allowed in Islam.

⁵GOV.UK, [Slaughter of Livestock: Welfare Regulations](#) as viewed on 7 May 2014

⁶ [Census 2011: The Jewish breakdown](#), *The Jewish Chronicle Online*, 13 December 2012

⁷ Scottish Food and Drink (Scottish Enterprise), [Kosher Food in the UK](#), March 2008

⁸ Halal.Markets.Net, [Method of slaughter in Islam](#) as viewed on 18 February 2015

- Animals must be slaughtered in a human way, without subjecting to any brutality or unnecessary suffering.

The [Halal Food Authority](#) (a halal certification body) sets out the requirements for Zibah as:⁹

- 1.The animal or bird should be alive and healthy at the time of slaughter.
- 2.Animal skin or fur, and bird feathers must be clean prior to slaughter and be free from faeces, mud or other unhygienic substances
- 3.Stunning is not used to kill the animal or the bird
- 4.A licensed Muslim slaughterer should slaughter by pronouncing shahada or tasmiya (when the knife is put on the throat of the bird or animal being slaughtered) “Bismillah Allahu Akbar”;
- 5.All the flowing blood should be drained out from the carcass by natural convulsion.

No dorsal cut is allowed in slaughterhouses approved by Halal Food Authority. Dorsal cut would make poultry proscribe for Muslim consumption.

Trends in the UK Halal Market

The Halal Food Authority has observed that demand for Halal products is on the rise amongst Britain's 2.7 million Muslims (most of who claim to be Halal consumers), and also in Europe, Asia and the Americas. The Halal Food Authority estimates that the UK market for Halal food grew 30% in 2006, even though the Muslim population is estimated to have remained at just 4.8%. 90% of Muslims indicate that they consume Halal meat with more than 8 out of 10 stating that they consume meat regularly.¹⁰

The industry body for the English Sheep and Beef sector EBLEX conducted a report on the Halal meat market in 2010, [The Halal Meat Market: Specialist supply chain structures and consumer purchase and consumption profiles](#). This found that although the Muslim community only makes up 3% (now 5%) of the population, the community are responsible for around 20% of lamb consumption in England.¹¹

Across Europe (where the Muslim population has grown by more than 140% in the last decade), there is a similar growth in demand with 2nd and 3rd generation European Muslims seeking out halal in European cuisines, convenience-foods and looking for products such as Halal fast food(s), pizzas, lasagne etc.

The Halal Food Authority notes that an increasing number of British meat, food and drink companies are seeking Halal endorsement and certification to widen market opportunities. For many, the catalyst is a specific export customer (often from the Middle East or South-East Asia), the airline catering market or an opportunity to supply public sector catering operations such as schools, colleges, hospitals and prisons. Many supermarket chains also stock cooked, chilled and frozen foods and packed halal meat & poultry that are in popular cuts.¹²

⁹ Halal Food Authority, [Requirements for Zibah](#) as viewed on 18 February 2015

¹⁰ Halal Food Authority, Halal standard, revised April 2014

¹¹ EBLEX, [The Halal Meat Market: Specialist supply chain structures and consumer purchase and consumption profiles](#), 2010, p.1

¹² Ibid

2 UK Government position on religious slaughter

In November 2014, George Eustice re-iterated the UK Government's long-standing position (over successive Governments) on religious slaughter in answer to a Commons debate on the issue.

He confirmed that the UK Government would prefer that all animals are stunned before slaughter, based on a "large body of research that concludes that it is better for the welfare of the animal for it to be stunned." However, the UK Government "recognises and respects the needs of religious communities, so has always maintained the limited exemption, which is to be used only for meat produced for Jewish and Muslim communities."¹³

However, he also emphasised that this did not mean the UK Government believed that there was no difference between the types of slaughter and that:

"none of the derogations that we have in place, which are set out through the Welfare of Animals (Slaughter or Killing) Regulations 1995, exempt anyone from the requirements of the Animal Welfare Act 2006, which requires all abattoirs to avoid causing an animal avoidable pain."

George Eustice reminded MPs that the Prime Minister had confirmed that he had no intention of abolishing religious slaughter in the country. David Cameron used his first visit to Israel as Prime Minister in March 2014 to vow that he would never ban the religious slaughter of animals for food.¹⁴

The Prime Minister's statement seemed to be prompted by a swell of interest in the issue at the beginning of 2014. The Danish Government announced in February 2014 that it was taking its existing restrictions further and banning any non-stun slaughter.¹⁵ (This is already the case in Sweden, Iceland, and New Zealand - see section 3.1 below). Then in March 2014, the British Veterinary Association's new President renewed the organisation's calls to ban non-stun slaughter. By May 2014, there was considerable press coverage of a range of issues surrounding halal and kosher meat and the BVA instigated its e-petition on the matter (see section 4.3 below).

In May 2013, the UK Government confirmed that it had been in constant dialogue with faith groups on making possible further improvements in animal welfare.¹⁶ This continued in 2014, with George Eustice saying that in the latter half of 2014 he had met with representatives from all sides of the debate including: Shechita UK, halal meat processors and Compassion in World Farming to ensure that he had a full perspective on the issue.¹⁷

3 UK Slaughter Regulations

UK slaughter practices are governed by EU Directives and regulations which include welfare considerations. The UK and Scandinavian countries in particular have tended to have a good

¹³HC Deb 4 November 2014 c168WH

¹⁴[Cameron vows never to ban religious slaughter of animals](#), *The Telegraph*, 13 March 2014

¹⁵*Global Meat News*, [Denmark bans non-stun slaughter](#), 20 February 2014

¹⁶[HC Deb 21 May 2013 c691](#) and this line is maintained in subsequent PQs

¹⁷ HC Deb 4 November 2014 c167WH

record in animal welfare and their welfare at slaughter requirements have tended to go further than the EU requirements.

At present there is a transition to new EU regulations in this area. [EU Regulation 1099/2009](#) (September 2009) on the Protection of Animals at the Time of Killing came into effect on 1 January 2013 in all Member States. The EU regulations set out minimum standards for slaughter and Member States are allowed to maintain more stringent national slaughter standards and controls if they have them.

Defra consulted on proposals ([Welfare of Animals at the Time of Killing](#)) to implement the Regulation from September-October 2012 and the Government published its [conclusions and a summary of responses](#) in May 2013. This consultation covered the religious slaughter exemption and the summary sets out the range of responses from stakeholders.

Most of the requirements came into force immediately but some measures in relation to layout, construction and equipment in existing slaughter houses do not come into effect until December 2019. The new regulation continues to permit the slaughter of animals in accordance with religious rites (see section 3.4 below).

Existing domestic legislation, The Welfare of Animals (Slaughter or Killing) (WASK) Regulations 1995 (SI 731) will remain in force in England alongside EU Regulation 1099/2009 until the new domestic legislation, The Welfare of Animals at the Time of Killing (England) Regulations (WATOK) are brought into force. These regulations have been delayed in England (see section below) but equivalent regulations are now in place in Wales and Scotland. The devolved administrations are free to develop their own approaches to the regulation.

Defra has confirmed that any areas where the UK's 1995 regulations provide more extensive welfare protection than the EU regulation will remain. For example the UK will maintain its rules that cattle for slaughter must be upright and restrained and the use of rotating crates employed in the religious slaughter of cattle will continue to be prohibited. The UK Government and Devolved Administrations are advised on farm animal welfare issues by the expert committee – the [Farm Animal Welfare Advisory Committee](#).

Under this combination of rules, it is an offence to cause or permit an animal to suffer avoidable excitement, pain or suffering. Animals must be handled, stunned and killed using specific methods by licensed and competent slaughtermen. Responsibility for animal welfare and food safety in slaughterhouses rests with the business operator.¹⁸

The UK has a long-standing legislative history in relation to stunning requirements and religious slaughter arrangements. In November 2014, EFRA Minister George Eustice explained them as follows:¹⁹

- The Government first set down powers to prevent cruelty in slaughterhouses in the Public Health Act 1875. Byelaws made under that legislation required that animals be “effectually stunned”.

¹⁸ FSA, [Results of the 2013 Animal Welfare Survey in Great Britain](#), January 2015

¹⁹HL 4611 5 February 2015

- In 1904, a Committee was set up to ascertain the most humane practicable methods of slaughtering animals. The Committee's report recommended that all animals to be slaughtered, without exception, should be stunned.
- The Local Government Board issued a circular proposing that the Committee's recommendations should be implemented, but that stunning should not be obligatory where slaughter was carried out by a Jew licensed by the Chief Rabbi, provided that no unnecessary suffering was inflicted. A similar requirement for shechita slaughter—that it is carried out by a Jewish slaughterman licensed by the Rabbinical Commission for the Licensing of Shochetim—still exists in current UK legislation.
- The first national legislative requirement in England and Wales for stunning before slaughter was in the Slaughter of Animals Act 1933, which also retained an exception from stunning for religious slaughter by Jews and Muslims. Over the years, the national rules governing religious slaughter have developed to provide protection to animals slaughtered in accordance with religious rites.²⁰

3.1 Derogation for religious slaughter

EU Regulation 1099/2009, like the regulations it replaces, allows for a derogation to Member States to allow religious slaughter without prior stunning. However, they can also refuse to exempt religious slaughter from pre-stunning regulations. This flexibility for religious practice is considered to be in accordance with Article 10 of the Charter of Fundamental Rights of the EU. Countries exporting meat to the EU must also comply with similar standards.²¹

Even with the derogation, religious slaughter must still observe strict requirements. For example, it can only be carried out in approved red meat slaughterhouses or, in the case of poultry, in approved or other officially regulated slaughterhouses (even when it is for personal consumption). In the UK, where bovine animals are slaughtered without pre-stunning the restraining pen used must be approved for slaughter without prior stunning.²² Only cattle, sheep, goats, turkeys, chickens, hens, guinea fowl, ducks, geese and quail may be slaughtered in accordance with the rules of Islam.²³ Further details are provided in section 3.4 below.

These requirements are monitored and enforced by Official Veterinarians of the Food Standards Agency to ensure that animals are spared unnecessary suffering, distress or pain during the slaughter process.

Application in other Member States

The flexibility in applying the religious slaughter derogation throughout the EU has led to some differences in practice across Europe:²⁴

²⁰ HC Deb 4 November 2014 c167WH

²¹ European Parliament Library [Religious slaughter of animals in the EU](#) 15 November 2012

²² Defra website, [Welfare at slaughter](#) as on 24 January 2013

²³ GOV.UK, [Slaughter of Livestock: Welfare Regulations](#) as on 3 September 2013

²⁴ HC Deb 4 November 2014 c168WH

- **Germany:** abattoirs have to prove the “religious needs” and define the number of animals to be slaughtered so as to satisfy the needs of the religious community concerned before they are granted a licence.
- **The Netherlands:** all animals must be stunned if they have not lost consciousness within 40 seconds of the cut being made.
- **France:** there must be a post-cut stun if cattle are still conscious after 90 seconds.
- **Denmark:** immediate post-cut stunning is required (also Austria, Finland, Estonia and Slovakia). Denmark tightened its existing restrictions in February 2014, in the face of opposition from religious groups who said that it infringed their religious freedoms. However, the Danish Government argued that non-stun slaughter had not taken place for many years already in Denmark and religious communities were reliant on imported halal and kosher meat.²⁵

Outside the EU, key meat exporting countries also require some form of stunning. In Australia, 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 religious slaughter without prior stunning for the domestic market, but post-cut stunning is still required for these animals.²⁶

The RSPCA reports that in New Zealand 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.²⁷ Compassion in World Farming notes that New Zealand is a large exporter of Halal-slaughtered sheep meat and a significant exporter of Halal-slaughtered beef. All of these exports are derived from animals who have been stunned before slaughter and this is accepted by the importing countries.²⁸

3.2 Delays to the English regulations

The English regulations were expected to come into force on 20 May 2014 and were actually laid before Parliament but then revoked before they came into force (by the Welfare of Animals at the Time of Killing (Revocation) Regulations 2014 on 19 May 2014).

The [Explanatory Memorandum](#) to the Regulations explains that after making the WATOK Regulations, it was decided that the potential impact on some limited aspects of religious slaughter needed further consideration. The Government notes the complexity of the legal framework (the regulations also contain national rules) it wanted to take some time to give full consideration to the relevant issues.²⁹

According to *The Grocer*, the WATOK legislation would have required abattoirs to increase currents for stunning poultry to potentially lethal doses which would not be suitable for Halal slaughter. These proposed changes were set to be challenged in a judicial review launched

²⁵ [Much ado about not much](#), *The Economist - Erasmus blog*, 18 February 2014

²⁶ HC Deb 4 November 2014 c168WH

²⁷ RSPCA. [Religious Slaughter](#), February 2015

²⁸ Compassion in World Farming, [Briefing – Religious Slaughter](#), May 2011

²⁹ Defra, [Explanatory memorandum to The Welfare of Animals at the Time of Killing Regulations 2014 No.1240 and The Welfare of Animals at the Time of Killing \(Revocation\) Regulations 2014 No.1258](#)

on behalf of 20 abattoir operators, the Halal Authority Board (HAB) and the Association of Independent Meat Suppliers (AIMS).³⁰ AIMS welcomed its victory but bemoaned what it believed to be the "incompetence and ignorance from Defra" that had caused the situation.

The HAB noted that "there was no discussion or conversation, they just went ahead. Unless they work with the Muslim community how can we get anywhere? They are totally ignoring the halal market, they only listen when you take them to court."³¹

3.3 Main requirements of the new regulations

The EU Regulation introduces a series of new, directly applicable operational requirements including stunning parameters, improvements to chicken shackle lines and requirements to the construction, layout and equipment of slaughterhouses. It also permits them to maintain existing national rules which provide for more extensive protection of animals at slaughter if those rules were in force at the time the EU Regulation came into force.³²

Under EC 1099/2009, responsibility for animal welfare and food safety in slaughterhouses rests with the business operator. As is the case within the UK, Member States may retain national rules which provide greater protection than EU requirements.

The EU Commission provides a helpful [overview of the Regulation](#).³³ Essentially it sets out a range of welfare and operational outcomes that should be achieved at the time of slaughter and covers stunning methods and handling and animal movements to slaughter. However, it is less specific about specific standards and methods than existing UK legislation, assuming that it meets requirements if the outcome is met and the operation is competent and monitored.

The EU regulation allows for "simple stunning", which is sometimes referred to as "recoverable stunning". Simple stunning does not kill the animal but renders it unconscious and insensible to pain and, if it is used, it must be followed as quickly as possible by a procedure that causes death, such as bleeding.³⁴

From 1 January 2013 certain operations in slaughterhouses or carried out on farms for the purpose of killing animals for food required a certificate of competence. Defra advised English slaughterhouses on the changes in an [information note](#) in December 2012. This stated that if they met the existing English welfare requirements (Welfare at the time of slaughter) they would also comply with the requirements in Regulation 1099/2009. However Regulation 1099/2009 introduces a number of new requirements and restrictions e.g. introducing Standard Operating Procedures and appointing an Animal Welfare Officer, which do not feature in WASK which had to be met from 1 Jan 2013.

The Regulation covers the following areas:

³⁰ Kevin White, "[Poultry producers welcome delay to rule change on stunning](#)" *The Grocer*, 22 May 2014

³¹ Halal Focus, [UK: Defra delay legislation for poultry](#), 23 May 2014

³² [Defra, Explanatory memorandum to The Welfare of Animals at the Time of Killing Regulations 2014 No.1240 and The Welfare of Animals at the Time of Killing \(Revocation\) Regulations 2014 No.1258](#)

³³ Europa website, [Animal Health and Welfare](#) page as viewed on 18 February 2015

³⁴ HC Deb 4 November 2014 c168WH

- **Increased operator responsibility through the use of a standard operating procedure including procedures for animal welfare.** Such as:
 - evaluating the efficiency of their stunning method which means that stunned animals have to be regularly monitored to ensure that they do not regain consciousness before slaughter
 - the requirement for each slaughterhouse to appoint an Animal Welfare Officer who is accountable for implementing animal welfare measures
- **Training and research on animal welfare:**
 - Staff to have certificates of competence regarding the welfare aspects of their tasks
 - Technical assistance for officials working in slaughterhouses on animal welfare
- **New requirements for killing for disease control purposes**
 - Requirements to ensure that any competent authorities carrying out large scale culling of animals for disease control purposes use welfare-friendly methods of culling (unless there are exceptional circumstances) and are more accountable to the public regarding the welfare of the animals culled. E.g. through better planning, supervision and reporting.
- **Updated standards**
 - A number of technical changes. E.g. the scope of stunning or killing methods are more strictly defined.

More detail about the welfare of animals at slaughter is provided on the .GOV.UK website on the [Slaughter of Livestock – Welfare Regulations](#) page.

3.4 How the new EU regulations apply to religious slaughter

Where an animal is slaughtered without prior stunning for consumption by a Jew or Muslim, the slaughter must take place in a licensed abattoir, licensed poultry slaughterhouse under official veterinary supervision, or in another officially regulated poultry slaughterhouse. Slaughter without pre-stunning is not allowed in any other place.

As regards religious slaughter, the Government has decided that in implementing the new EU regulations it will:³⁵

- Retain existing national rules in relation to religious slaughter [these provide greater protection than the EU Regulation].³⁶ These rules limit slaughter without prior stunning to the slaughter of bovine animals, sheep, goats and birds by a Jew for the food of Jews or by a Muslim for the food of Muslims.
- Continue to apply the following current, national rules which :

³⁵ Defra, [Animal Welfare: Summary of responses to the consultation on the Welfare of Animals at the time of killing from 13 September 2012 to 24 October 2012](#), May 2013, p.54

³⁶ HC Deb 4 November 2014 c167WH

- a) Bovines must be slaughtered in an upright position in a restraining pen approved for that purpose by the competent authority (to be the Food Standards Agency under the new legislation)
- b) Restraint of a bovine animal is prohibited until the slaughterman is ready to make the incision.
- c) Bovines must be slaughtered in an upright position in a restraining pen approved by the Secretary of State
- d) Shackling and hoisting is prohibited until the animal is unconscious and not before a specific period has elapsed.
- e) Back up stunning equipment is to be available for use in an emergency
- f) The knife must be of a sufficient size and sharpness for slaughter
- g) Licences for Schechita slaughter will continue to be issued by the Rabbinical Commission
- h) Religious slaughter of poultry, rabbits and hares outside a slaughterhouse for private domestic consumption is prohibited.

The requirements for bovine restraining pens are set down in national legislation. Other national rules concern so-called standstill times for cattle, sheep and goats; following the neck cut, the animal cannot be moved until at least 30 seconds have passed and the animal is unconscious, in the case of bovines, or at least 20 seconds have passed and the animal is unconscious, in the case of sheep and goats. The standstill times are aimed at providing protection from avoidable pain, suffering and distress caused, for example, by unnecessary movement while the animal is still conscious after its neck has been cut.³⁷

4 Animal welfare

The main animal welfare issue in relation to religious slaughter relate to the lack of stunning prior to slaughter and the degree to which the animals feel pain without this stunning.

The main methods of stunning currently used in the UK for cattle and sheep have been helpfully summarised in *Farmers Weekly* as follows:³⁸

Electric head stun – largely used for sheep slaughter, the animal will have electric tongs placed on its temple and electricity passes through its brain. This is a recoverable stun and doesn't kill the animal, so some Muslims accept it as halal.

Head-to-back stun – sends electricity through the brain and heart at the same time. Because this can cause cardiac arrest and kill the animal, it is not accepted as halal slaughter. It's not widely used in the UK because of issues with quality.

Captive bolt stun – a retractable bolt gun fires into the brain of the animal, causing concussion. Most sheep will die but some will just be brain damaged so it is not accepted as halal slaughter. This is the most commonly-used method for slaughtering cattle for the non-halal market.

³⁷HC Deb 4 November 2014 c167WH

³⁸ *Farmers Weekly*, Eblex assurance scheme should clear up halal confusion, 30 January 2014 as highlighted in [Halal Focus](#) a consultancy specialising in the Global Halal Market.

Non-stun – the major blood vessels in the throat of the sheep or cattle are cut with one movement of a sharp knife causing a loss of consciousness. This is the traditional halal slaughter method.

4.1 Extent of pre-stunning in religious slaughter (UK)

The latest Food Standards Agency Survey of welfare in abattoirs was published in January 2015 and was based on a snapshot of practice at 232 red meat slaughterhouses and 69 white meat slaughterhouses in September 2013. It found that 2% of cattle, 15% of sheep and goats and 3% of poultry were not stunned prior to slaughter in accordance with religious rites. No animals slaughtered by the Shechita (Jewish) method were stunned.³⁹

The 2015 survey found that 75% of cattle were stunned before halal slaughter, 63% of sheep and goats and 84% of halal poultry was pre-stunned.

Food Standards Agency (FSA) figures from 2012 (based on a survey of slaughterhouses in September 2011) showed that the majority of animals destined for the Halal trade in both the red and white meat sectors, around 80% of animals, were actually stunned before Halal slaughter. 84% of cattle/calves were stunned before Halal slaughter, 81% of sheep and goats and 88% of poultry. The results indicated that the number of animals not stunned prior to slaughter were relatively low, accounting for 3% of cattle, 10% of sheep and goats and 4% of poultry.⁴⁰

The British Veterinary Association has expressed disappointment at the slight rise in non-stun slaughter that these new figures indicate. The BVA notes:⁴¹

- 31% increase (from 279 to 366) in the number of cattle not stunned before slaughter for Halal compared with the FSA's 2011 Welfare Survey.
- The figures also showed an increase of 56% (from 28,734 to 44,950) of sheep and goats not stunned before slaughter for Halal.
- The figures revealed a small drop of 1.7% in the number of poultry not stunned before slaughter for Halal from 582,776 to 572,429.
- There was a decrease in Kosher (Shechita or non stunned slaughter) in cattle from 1314 to 475 (-66%), in sheep and goats from 1917 to 601 (-68%) and poultry from 71,236 to 21,716 (-69%).

4.2 Do the animals feel pain with religious slaughter methods?

The British Veterinary Association (BVA), The Federation of Veterinarians of Europe, the Farm Animal Welfare Committee, the Human Slaughter Association (HSA) the RSPCA and the National Secular Society (NSS) are against slaughter without pre-stunning because they believe that scientific evidence demonstrates that it compromises animal welfare. The NSS

³⁹Food Standards Agency, *Results of the 2013 FSA animal welfare survey in Great Britain*, January 2015

⁴⁰Food Standards Agency, *Results of the 2011 FSA animal welfare survey in Great Britain*, 22 May 2012

⁴¹ BVA, *E-petition to end non-stun slaughter hits 100,000 as FSA figures show increase in non-stun*, 29 January 2015

believes that research shows that it is more human to stun an animal prior to slaughter than not to do so.⁴²

However, Shechita UK argues that a proper cut acts effectively as a stun and that the possibility of mis-stunning is a welfare issue in itself.⁴³ In a counter [e-petition](#) (over 38,000 signatures to-date) to that of the BVA's (see below), organisations such as the Halal Monitoring Committee argue that Judaism and Islam require adherents to treat animals with kindness and to minimise pain when slaughtering and that scientific evidence shows minimisation of suffering when religious slaughter is practiced properly.

The e-petition cites a [range of studies](#) by Prof. Temple Grandin, an American professor of animal science at Colorado State University.

The e-petition observes:

Stunning in abattoirs frequently fails to effectively stun the animal, thereby causing suffering. The British Veterinary Association and others opposing religious slaughter should focus on improving the competence of slaughterers who stun, instead of attacking methods that have been shown to minimise suffering

Animal welfare organisations that support a ban on non-stun slaughter all cite a range of key research and reports, which are also acknowledged by the UK Government.⁴⁴ The RSPCA's fact sheet [Religious Slaughter](#) (February 2015) provides further information on these sources which are highlighted below.

Farm Animal Welfare Council report (June 2003)

The Farm Animal Welfare Council's (now Committee) 2003 report [Welfare of Farmed Animals at Slaughter or Killing](#) (Red Meat -Part 1) concluded that:

- **Slaughter without pre-stunning is unacceptable and the Government should repeal the current exemption (para 201).**

The Council found that such slaughter did not satisfy two of its key principles to ensure the welfare of animals at slaughter: pre-slaughter handling facilities that minimised stress or the induction to a period of unconsciousness without distress. The Council therefore considered that unnecessary suffering was inflicted against the requirements of the exemption.

The Foreword to the report stressed that this was "not a moral judgement".

- **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 (para 203).**
- When a very **large transverse incision is made across the neck** a number of vital tissues are transected...Such a drastic cut will inevitably trigger a barrage of sensory

⁴² National Secular Society, [Religious slaughter of animals](#) web page as of 13 March 2014

⁴³ Shechita UK, [A guide to Shechita](#), May 2009 p.3

⁴⁴ See for example, HC Deb 4 November 2014 c170 WH

information to the brain in a conscious animal. We are persuaded that such a massive injury **would result in very significant distress in the period before insensibility supervenes.**

The Council acknowledged that it was hard to assess pain in animals when having their throat cut because they could not display key behavioural responses due to restraint and severance of the trachea. However, the Council concluded that equally it was not possible to conclude objectively that the animal would not feel pain and distress following such a procedure.

- Different species lose consciousness with blood loss at different rates because of the differences in their blood supply to the brain. The Council observed that the scientific evidence "shows that sheep become insensible within 5-7 seconds of the cut (3-7 seconds in goats). Adult cattle, however may take between 22 and 40 seconds and this period may be extended if occlusion of the carotid arteries take place. Work done on calves has shown a variation in period to insensibility from 10 -120 seconds depending on the extent of occlusion [blockage] of the carotid arteries or ballooning in blood vessels." (para 198)

A separate study of brain response after Shechita slaughter of cattle compared to that after captive-bolt stunning indicated responses for up to 60 seconds in the former and no response in the latter. (para 198)

[However, Shechita UK points to a number of studies which have also indicated that animals unrestrained during Shechita did not move away and did not appear to realise that their throat had been cut.⁴⁵]

European Food Safety Authority (2004)

The [European Food Safety Authority](#) issued an opinion in 2004 maintaining that there was more pain and suffering if there was no stun. The EFSA opinion found that "due to the serious animal welfare concerns associated with slaughter without stunning, pre-cut stunning should always be performed."⁴⁶

EU Dialrel report and project

The [EU Dialrel](#) report and project found that unstunned animals feel pain during and after throat cutting without prior stunning.

The project was conducted between 2006-2010 (with partners in 11 countries) to encourage dialogue on issues related to religious slaughter. Its veterinary report presented a number of recommendations aimed to provide guidelines to slaughterhouse' operators on practices related to religious slaughter related to animal welfare at the time of killing based on best scientific knowledge at the time. It focussed attention on the most risky aspects of religious slaughter, either performed without stunning or with pre/post-cut stunning, from the point of view of the welfare of animals.

⁴⁵ Shechita UK, [A guide to Shechita](#), May 2009 p.3

⁴⁶ EFSA Journal, [Opinion of the Scientific Panel on Animal Health and Welfare \(AHAW\) on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals](#), 11 October 2004

Some key conclusions of the veterinary report were:⁴⁷

- All slaughter methods bear the risk of inadequate equipment or lack of sufficient knowledge or skills. They should be compared either if performed under optimum conditions or including an evaluation of the specific risks under practical conditions.
- There is considerable room for development and improvement with regard to management of the implicated risks for all slaughter methods.
- It can be stated with high probability that unstunned animals feel pain during and after the throat cut without prior stunning.
- 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 severe blood loss. In addition multiple cuts could increase the potential of inflicting further pain. This period represents a special risk.
- Stunning post-neck cutting will avoid potential pain and suffering from the moment it is applied. This should markedly improve animal welfare in relation to neck cutting without stunning during the time between the cut and loss of consciousness.

New Zealand/UK funded research - Massey University (2009)

In 2009, New Scientist reported the findings of Craig Johnson from Massey University in New Zealand, whose work was funded by the UK and New Zealand Agriculture Ministries which found brain signals showing that calves do appear to feel pain when slaughtered according to Jewish and Muslim religious law.⁴⁸

4.3 Consolidated opposition to non-stun slaughter

The British Veterinary Association (BVA), The Federation of Veterinarians of Europe, the Farm Animal Welfare Committee, the Human Slaughter Association (HSA) and the RSPCA are against slaughter without pre-stunning. The BVA's new President re-stated the organisation's long-standing views on slaughter without pre-stunning in March 2014 setting out a co-ordinated line with HAS and the RSPCA:⁴⁹

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.

⁴⁷ DIAREL Project, K.vol Holleben et al, *Report on good and adverse practices- Animal welfare concerns in relation to slaughter practices from the viewpoint of veterinary sciences*, February 2010

⁴⁸ *Animals feel the pain of religious slaughter*, *New Scientist*, 13 October 2009

⁴⁹ BVA, *BVA reiterates call for animals to be stunned before slaughter*, 6 March 2014

The three organisations suggest that if the government intends to continue to allow an exemption for non-stun slaughter then it should explore a range of alternative actions to improve animal welfare and consumer awareness, working with representatives of the relevant religious communities such as:

- Enhancing the enforcement of existing welfare at slaughter legislation where non-stun slaughter takes place
- Immediate post-cut stunning.
- Ensuring time and facilities for the Official Veterinarian to be able to adequately monitor welfare where 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 that 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.

The BVA instigated an [e-petition](#) in March 2014 calling for pre-stunning of all animals. The Association has made it clear that it has no issue with the religious methods of religious slaughter – just the pre-stunning element. The petition has received over 114,000 responses to-date, and received a government response. It states:⁵⁰

We call for an end to slaughter without pre-stunning for all animals. EU and UK law requires all animals to be pre-stunned before slaughter to render them insensible to pain until death supervenes. But non-stun slaughter is permitted for certain communities.

We support BVA, RSPCA, HSA, FAWC and FVE who conclude that scientific evidence shows that non-stun slaughter allows animals to perceive pain and compromises welfare.

We must differentiate between religious and non-stun slaughter. Our concern does not relate to religious belief but to the animal welfare compromise of non-stun slaughter.

We note

- over 80% of UK Halal slaughter is pre-stunned hindquarters of animals killed by (non-stun) Shechita can enter the market unlabelled
- While non-stun slaughter is permitted we call for clearer slaughter-method labelling and post-cut stunning to improve welfare.
- Non-stun slaughter affects millions of animals. We support a good life and a humane death for all animals.

⁵⁰ HM Government, [e-petition: End non-stun slaughter to promote animal welfare](#)

4.4 All Party Parliamentary Group for Beef and Lamb - Report 2014

The All Party Parliamentary Group (APPG) for Beef and Lamb (APPG) published their report *Meat Slaughtered in Accordance with Religious Rites* in August 2014. The APPG, chaired by Neil Parish MP, took oral and written evidence for their report from a range of stakeholders including: the slaughter sector, Shechita UK, the Halal Food Authority, veterinary professionals, Farming Minister George Eustice and the European Commission.

The APPG's inquiry looked at improving animal welfare at slaughter focussing on the methods used in producing halal and kosher meat. It also briefly considered the associated issue of what kind of meat labelling might best support consumer choice. The report's recommendations (see below) highlight areas of research which would better support the evidence-base for policy-making in this area as well as future slaughter practices.

The APPG hope that the findings from their inquiry will help MPs, industry, government officials and NGOs take a more balanced and evidence-based approach to their policy-making when responding to the EU Commission's forthcoming research on method of slaughter labelling.

Key findings and recommendations

In the Foreword to the APPG report, Mr Parish notes that there "are no easy solutions to what is legally and culturally a very complicated set of circumstances". The report identifies several areas where greater research is needed. These include:

- the measurement of pain in animals at the time of slaughter
- demonstrating the recoverability of certain stunning methods to reassure religious communities that they are compatible with their religious requirements relating to harm and damage to the animal.
- consumer attitudes to method-of-slaughter labelling and the costs of mandatory labelling on the food industry

The report makes nine recommendations in areas where more information could allow more evidence-based comparison between the different slaughter options and means of compliance with Halal and Schechita requirements. These can be summarised as:

1. Research to be reviewed and new research to be undertaken where necessary to determine the effect of stunning on the **residual blood content** left in meat in comparison to that produced from slaughter without stunning.

[A secondary requirement for halal is that any form of stunning that does not in itself kill the animal must not have an adverse affect on blood loss. It must be evident that the type of stun would not result in more blood remaining in the carcass than would be the case without stunning.]

2. The demonstration of **recoverability** abattoirs should be considered as a means to reassure customers the animal is not killed by stunning and therefore is Halal compliant.

[Halal slaughter requires that the animal is not killed at the point of stunning and it is not the stun that kills the animal. This can be shown by post-stunning recovery. However, demonstration of recoverability is not currently permitted in the UK. It is therefore hard to prove to Muslim customers that this condition has been met.]

3. That the **use of electro-immobilisation**, a practice that is not currently permitted in the UK, be re-examined to determine scientifically if it is required in order to take into account the associated dangers to operator safety in relation to carcass kicking.

[There is a safety issue associated with using only electrical stunning for larger animals as the cattle may kick unless immobilised as in New Zealand and Australia]

4. More research into the **Shechita** method of slaughter and the likelihood and duration of **pain felt when the cut is made**.

[Shechita UK argues the Shechita method of slaughter acts as a stun in its own right]

5. To help inform the debate on **mis-stunning and mis-slaughtering** the Group believes that statistics on the incidence of mis-slaughtering is made available to see if it is higher or lower under certain methods (just the mis-stuns are currently recorded and the animal species not the method associated with that mis-stun).

[The possibility of mis-stunning is often cited by religious communities as a threat to the welfare of the animal that means that stunning should not be permissible.]

6. The Government should conduct a **review of the guidelines** that are available to slaughtermen who slaughter animals in accordance with religious rites and reconsider the use of new legislation regarding the use of CCTV in slaughterhouses.
7. Greater research is needed into the measurement of pain in animals at the time of slaughter and in demonstrating the recoverability of certain stunning methods to reassure religious communities that they are compatible with their religion.
8. Labelling should help consumers make informed decisions when buying meat should be carried out on a stun versus non-stun basis, and that an impact assessment on the burden to the industry should be undertaken in relation to mandatory labelling.
9. That a consumer attitudes survey towards meat labelling is conducted to see if the public would like to see meat labelled in accordance with stunning or non-stunning, and additional information such as the type of stun that was used and if any religious requirements were needed to be met in producing the meat.

Government response on mis-stunning

The UK Government has responded to the APPG's representations regarding mis-stunning statistics (see above).

George Eustice confirmed in the debate on the report in November 2014, that the Food Standards Agency had reviewed the way that it approaches the reporting of mis-stunning and in future the FSA intends to monitor and record all breaches, whether or not they are

critical. Previously, it only reported critical breaches that were observed by the official veterinarians in the slaughterhouse and the UK Government accepted that it would not pick up every single mis-stun. The Minister was keen to point out that not all mis-stuns have a “dire” welfare outcome for the animal but nonetheless the UK Government was concerned about mis-stunning and would therefore monitor it. E.g. with bovine animals the first shot of the captive bolt may not quite work and within seconds and effective second bolt achieves the stun.⁵¹

4.5 CCTV in slaughterhouses

The recent focus on religious slaughter methods has met the parallel debate around installing CCTV in slaughterhouses because of recent undercover footage shot by [Animal Aid](#) released in January 2015, but taken over three days in December 2014, at Bowood Yorkshire Lamb halal slaughterhouse (a trading arm of Bowood Farms Ltd). This was part of a wider investigation of nine randomly chosen UK slaughterhouses (not just halal).

The cruel treatment of animals which was filmed has caused the FSA to suspend the licences of the slaughtermen involved. An [FSA statement](#) on the incident observed that there is “no excuse for treating animals in the way shown in the video and we are therefore investigating the footage with a view to prosecution. We are also continuing to investigate all the circumstances around the incident to ensure that proper safeguards are introduced to stop this happening in the future.”⁵²

Animal Aid says that it has found breaches of welfare laws in eight of the nine slaughterhouses which it investigated. It found incidences of inadequate and multiple stunning and neither the government-appointed on-site vets nor the slaughterhouse operators detected any of the illegal acts that were filmed.⁵³ The organisation is calling for mandatory CCTV in slaughterhouses and is supporting an e-petition [Make CCTV mandatory for all Slaughterhouses](#) which now has over 107,000 signatures.

UK Government position

Compulsory CCTV at slaughterhouses was considered in 2013 as part of the implementation of EU Regulation 1099/2009 on the protection of animals at the time of killing in England. However, the UK Government was not convinced of the need for further legislation and has been keeping the need for CCTV under review in the context of the new monitoring requirements required under the Regulation.⁵⁴ The Government response to the e-petition on CCTV monitoring points out that some of the slaughterhouses filmed by Animal Aid did have CCTV.

The [Farm Animal Welfare Committee](#), which advises the Government, was already carrying out an independent assessment of CCTV and in November 2014 the UK Government said that it would look at its options in the light of this report (see below).⁵⁵

The Food Standards Agency supports the use of CCTV in slaughterhouses and is encouraging it as best practice:

⁵¹HC Deb 4 November 2014 c170 WH

⁵² FSA, [FSA Statement on Abattoir footage released by Animal Aid](#), 3 February 2015

⁵³ E-petition, [Make CCTV mandatory for all slaughterhouses](#) as viewed on 18 February 2015

⁵⁴ HC Deb 15 October 2013 cc75-7W and HC Deb 4 November 2014 c170 WH

⁵⁵ HC Written Question No. 213448 11 November 2014 and HC Written Question 223204 9 February 2015

The scale of meat production means that the FSA cannot oversee the slaughter of every animal. There is also often limited space in the stunning pen to observe slaughter. The FSA therefore supports the use of CCTV in slaughterhouses as an effective monitoring tool for animal welfare - for both the food business operator and their management team, or the FSA – to ensure necessary standards are being met at all times.

The FSA's experience is that food business operators who have CCTV in use for animal welfare are keen to demonstrate the high standards at which their operatives work. However, current legislation does not require food business operators to install CCTV and therefore the FSA cannot enforce its installation. The FSA is working with operators and the meat industry to encourage voluntary installation as best practice.⁵⁶

The FSA's latest survey of welfare practices in UK abattoirs (published January 2015 and based on a September 2013 snapshot) found that 55% of white meat slaughterhouses and 43% of red meat slaughterhouses now have some form of CCTV in use for animal welfare purposes. The survey found that CCTV uptake for animal welfare monitoring has increased in availability and coverage since the FSA's 2011 survey.⁵⁷

Farm Animal Welfare Committee opinion

The FAWC released an opinion in February 2015 recommending that slaughterhouses install CCTV in a structured and proportionate way. However, the Committee has not suggested that this should be mandatory. The Committee supports CCTV in approved slaughterhouses as a complement to statutory and other observation procedures undertaken by both the Food Business Operator and regulatory agencies.

The opinion also makes recommendations about how CCTV is installed and operated, staff trained and informed and future developments in technology are progressed to protect animal welfare. It recommends that:⁵⁸

- All slaughterhouses should install CCTV in all areas where live animals are kept and where animals are stunned and killed
- All assurance schemes, food retailers and others in the food chain should require that CCTV be installed in the slaughterhouses associated with them
- CCTV footage should be retained by the slaughterhouse for a period of at least three months and be made available to authorised officers
- Government, the slaughter industry and the rest of the food chain collaborate on research to establish scientifically, and quantify if applicable, whether the presence of CCTV and the systematic viewing and review of CCTV footage in line with recommended consistent industry protocols will achieve the full potential benefits we foresee in terms of good operator practice and animal welfare.

The RSPCA has welcomed the growing support for slaughterhouse CCTV but was disappointed that the FAWC had not urged the introduction of legislation to make it

⁵⁶ FSA, [Animal Welfare at Slaughter](#) web page as viewed on 18 February 2015

⁵⁷ FSA, [Results of the 2013 animal welfare survey in Great Britain](#), January 2015

⁵⁸ FAWC, [Opinion on CCTV in slaughter houses](#), February 2015, p.19

mandatory.⁵⁹ The [Association of Non-Stun Abattoirs](#) (ANSA) has already expressed support for CCTV monitoring at killing stations.⁶⁰

A number of organisations already require CCTV. The FWAC notes that most major food retailers including Asda, the Co-operative, Iceland, Marks and Spencer, Morrisons, Sainsbury's, Tesco, Lidl and Waitrose now insist upon the use of CCTV in supply chain slaughterhouses. The RSPCA requires CCTV in abattoirs that are members of its Freedom Food scheme.⁶¹

4.6 Halal accreditation and pre-stunning

Halal certification is required for food to be accepted by Muslim consumers. Essentially, certification is provided via a number of different groups which offer accreditation according to their own procedures. Some of these allow for pre-stunning of animals. However, none of these groups have a standardised version of what constitutes Halal. The Muslim Council of Britain has consistently called for the community to work towards a national set out agreed standards and accreditation in halal methods of slaughter.⁶²

The certification is not an official, legally regulated system beyond the fact that halal meat is bound by the same regulations as other meat except in terms of some aspects of the slaughter process. Thus, it operates like other accreditation schemes which promote certain specialised criteria beyond regulation e.g. organic credentials, fair trade etc.

The [Halal Food Authority \(HFA\)](#) is an independent, voluntary, not for profit organisation operating as a commercial wing of a registered charity. HFA's Halal standard (which has recently been updated) stipulates that pre-slaughter stunning is permitted to stun the animal/bird and not to be used to kill the animal/bird.

The European Halal Development Agency ([EHDA](#)) is a Europe-wide not-for-profit organisation. The EHDA standard also accepts stunned meat and requires labelling to show if certified meat is stunned or non-stunned so as to promote consumer choice. EHDA has developed Halal Certification and Auditing standards to provide Halal assurance throughout the supply chain and to ensure food and non-food products and processes are genuinely halal.

The EHDA [FAQ page](#) explains how certification works:

....a food product can be certified as 'Halal' after it has been determined that the ingredients used in its production (and the process of production) is in compliance with the Halal standards of Islamic law. This requires supervision from an independent and qualified third party. A Halal certificate is normally issued for each product that a business produces.⁶³

The [Halal Monitoring Committee](#) is another independent, not-for-profit organisation offering halal certification. HMC is governed by an independent board of elected members comprising of mainly Islamic Scholars and other individuals - referred to as the Executive Committee (EC). The board's focus is to provide spiritual and Islamic guidance on all HMC

⁵⁹ [Calls for mandatory abattoir CCTV gather pace](#), *Farmers' Guardian*, 11 February 2015

⁶⁰ FAWC, [Opinion on CCTV in slaughter houses](#), February 2015

⁶¹ *ibid*

⁶² Muslim Council of Britain Press Release, [Animal Welfare at the Heart of Halal Slaughter: Muslim Council condemns abattoir revelations](#), 3 February 2015

⁶³ EHDA website, [Frequently Asked Questions](#) page as on 27 March 2013

matters. The EC work on a voluntary and unpaid basis. Further support is given to EC by Local Area Groups in around 35 UK cities & towns, who work to promote Halal awareness issues and promote the development of genuine halal in the UK.⁶⁴

5 Labelling issues

Many consumers have been surprised to hear that some supermarkets sell halal meat without it being labelled as such. This tends to be pre-stunned meat from New Zealand which has also had a blessing. This allows other cuts from the same carcasses to be marketed in the Middle East.

Many consumers would like the opportunity to avoid eating meat that has been subject to religious slaughter for welfare or religious reasons. Others need reassurance that their meat has been prepared in accordance with their religious beliefs. However, method of slaughter is not currently a labelling requirement. It is only an offence to mislead the customer e.g. to label something as halal when it has not been prepared by the appropriate methods. In addition, meat can be labelled as halal when it has been pre-stunned.

Sainsbury's and Tesco have both said (see section 7 below) that as they do not specify Halal standards to these suppliers then they do not label this meat as Halal. The Government has acknowledged that there is public concern about meat from animals slaughtered in accordance with religious beliefs being sold to consumers who do not require their meat to be prepared in this way.⁶⁵

5.1 UK Government position

There is no overall, legal requirement at EU or UK level to indicate method of slaughter on meat labels. Nor are there specific regulations governing the sale and labelling of halal or kosher meat. However, if meat is labelled as such it must not mislead the consumer.⁶⁶ Most Halal and kosher meat is already voluntarily labelled in accordance with the requirements of relevant certification bodies (see section 4.6 above).⁶⁷

However, there has been support at EU level in the last few years (lead by the UK and Sweden), regarding the introduction of labelling requirements for meat produced via religious slaughter to make it clear to customers if the meat has been prepared without stunning.⁶⁸ Any such labelling requirement would have to be introduced at EU level.⁶⁹

In discussions on the new Food Information Regulations a few years ago, the European Parliament supported proposals to label products from non-stun slaughter as part of origin labelling requirements but agreed to compromise and withdraw the amendment to achieve a consensus on the rest of the regulation.

The matter is now being considered in the context of future EU strategy for the protection and welfare of animals and a new Commission study on method-of slaughter labelling is awaited to take the matter forward. The UK Government has said that it will look at possible options in the light of that report."⁷⁰

⁶⁴ HMC website, [Home page](#) as on 27 March 2013

⁶⁵ HM Government response to [e-petition: End non-stun slaughter to promote animal welfare](#)

⁶⁶ [HC Deb 4 Mar 2013, c815-6W](#)

⁶⁷ [HC Deb 26 March 2014 c.243 W](#)

⁶⁸ [HC Deb 13 June 2012 WS136](#)

⁶⁹ [HC Deb 20 March 2013 c702W-](#)

⁷⁰ [HC Deb 26 March 2014 c.243 W](#)

The report had been expected in summer 2014 but farming Minister George Eustice MP told the APPG that the considerable press coverage on religious slaughter in the UK last year had delayed the report. In November 2014, he said that the contentious nature of the report meant it was taking the Commission longer than it originally envisaged to complete.⁷¹ He also highlighted some of the difficulties in considering labelling such as whether there was any consumer appetite for listing all the different methods of slaughter and the fact that there are difficulties in defining halal and kosher. For example, there is no single definition for halal and not all meat slaughtered by kosher methods is deemed kosher - such as the hind quarters of an animal -even if it is slaughtered by the kosher method.⁷²

5.2 Attempted amendment to the Consumer Rights Bill in 2014

In May 2014, MPs had a brief opportunity to discuss the issue of labelling of meat prepared by religious slaughter methods when Philip Davies MP tabled an [amendment to the Consumer Rights Bill \(new clause 13\)](#). This amendment sought to require all products containing halal and kosher meat to be labelled as such at the point of sale by retail and food outlets. This amendment did not survive a vote with MPs highlighting the need to consider method-of-slaughter labelling requirements for all meat, not just that prepared by religious methods.

Answering the clause, Consumer Affairs Minister Jenny Willott, noted that this was a "complex and sensitive" area and that the Government wants people to have the information that they need to make informed choices about the food that they buy. She pointed out that many retailers, restaurants and fast food outlets already voluntarily provide information on whether meat is halal or kosher and also that there is no single, clear definition of halal meat.

She highlighted that the Government already has powers under the Food Safety Act 1990 to make domestic regulations to introduce a requirement to label with the method of slaughter but did not currently feel that regulation was the best approach. If there is to be compulsory labelling, the UK Government believes that this would need to be at European level for the best outcome for consumers and so that the UK food industry was not put at a competitive disadvantage.⁷³

Consumer interest in the matter is high in the UK and this is reflected in the fact that all of the main UK supermarkets provide some form of information on their websites about how much of their halal meat is pre-stunned (see Section 6 below).

5.3 Stakeholder views on labelling

A range of organisations including the British Secular Society, the Muslim Council of Britain, Halal Food Authority, Shechita UK, and the British Veterinary Association have indicated their support for some form of labelling which indicates whether animals have been stunned before slaughter whilst a pre-stunning exemption remains in place. Consumers could then make a choice according to the nature of their concerns whether based on animal welfare or their personal beliefs. The APPG report also favoured stun or no-stun type labelling (see above).

⁷¹HC Deb 4 November 2014 c169WH

⁷²HC Deb 4 November 2014 c170 WH

⁷³ HC Deb 13 May 2014 c. 692

In a joint letter to the Daily Telegraph in May 2014, Henry Grunwald (Chairman of Shechita UK) and Dr Shuja Shafi (Deputy General, Muslim Council of Britain) called for "comprehensive labelling" informing the consumer of methods of stunning and slaughter to be supported by faith communities and animal welfare groups alike.⁷⁴ They said that such labelling:

"would offer all consumers genuine choice, whether they are motivated by animal welfare, religious observance or even intolerance of anyone who looks or worships differently to them."⁷⁵

The [British Veterinary Association](#) is calling for:⁷⁶

....one clear EU-wide welfare label that takes into account the whole-life welfare of food animals - including the production system, method of transport and whether the animal was stunned before slaughter or not. We believe that the current voluntary labelling system is confusing for consumers. Country of origin labelling should include information on where the animal was born/hatched, reared and slaughtered.

However, ultimately the [Halal Food Authority](#) would like to see halal defined and protected by legislation in order to be regulated appropriately to protect consumers from potential mislabelling and/or misrepresentation. The Authority is concerned that if the responsibility for labelling is placed directly with the retailers then there will be an increase in the self-certification of halal products. The HFA firmly opposes halal self-certification as the entire production process is not vigorously regulated as it would be if slaughterhouses and product manufacturers were accredited by an independent, reputable certification body.⁷⁷

The [British Retail Consortium](#) has said that its members would be happy to change labelling if there was evidence of concerns about animal welfare in terms of stunning before slaughter.

It is also worth noting that EBLEX the part of the Agriculture and Horticulture Development Board which represents the beef and lamb industry has established a [Halal Forum](#) and consulted on an assurance scheme for halal in October 2013.⁷⁸

6 Supermarket and food outlet policy- some examples

Here are some examples of the information which a sample of supermarkets make available to their customers regarding their policies on halal and kosher meat (information taken from their websites) as well as Pizza Express and Subway. The latter were two food outlets particularly covered in press stories in May 2014. The wording for the policies changes regularly indicating that the companies recognise this as a key issue for customers and other stakeholders.

⁷⁴ Shechita UK has reiterated this view in a position in a recent Press Release, [Shechita UK prepares for Westminster Hall debate](#), 16 February 2015

⁷⁵ Letter; [All meat should be labelled with details of its slaughter](#), The Telegraph, 8 May 2014

⁷⁶ BVA, [BVA position: Welfare at slaughter](#), as viewed on 3 November 2014

⁷⁷ Halal Food Authority, [HFA supports meat labelling](#), 9 May 2014

⁷⁸ EBLEX, [Assurance scheme will deliver clear labelling on halal sheep meat](#), October 2013 and [Forum Shows support for halal assurance scheme](#).

Morrisons:

We respect the fact that some religious communities want to eat food produced in accordance with their beliefs and sell branded halal and kosher products where there is strong customer demand. It's clear from the labelling that these products are halal or kosher.

Customers who do not wish to purchase halal or kosher products can choose Morrisons-branded fresh meat in full confidence that all animals are stunned and no prayer is read at slaughter. The same applies to all of the meat sold from our in-store butchers counters.⁷⁹

Sainsbury's

In line with our high welfare standards, all the animals used for our own brand meat are stunned prior to slaughter.

Under no circumstances would any of our own brand meat be from an animal that has not been stunned prior to slaughter. The animal will always be treated humanely with the utmost respect. In New Zealand it is common for lamb to be blessed however we have never requested this and all of our own brand meat is from animals stunned prior to slaughter so it would be wrong to label our own brand meat as Halal.

We do sell a selection of branded halal and kosher products in some stores, all of which is very clearly labelled.⁸⁰

Tesco

Tesco has a lengthy religious slaughter statement explaining its policies and range of products. It states that:

We require all slaughter processes for Tesco branded products to meet our stringent animal welfare requirements, without exception. In every case, the animal is stunned before slaughter.

We do however, in some stores, sell branded meat or host concessions that sell halal and kosher meat.

It also acknowledges that some meat is from suppliers who prepare all of their meat to halal standards because they also serve Middle Eastern markets. As the supermarket does not specify any halal practices to these suppliers it therefore does not label this meat as halal. This meat will have been stunned before slaughter and will have received a blessing.⁸¹

Waitrose:

Our priority is to ensure animal welfare of the highest standard across all our supply chains.

⁷⁹ Morrisons, [Our company and policies: Your top FAQs about our company and our policies](#) as viewed on 18 February 2015 and altered since viewed on 3 November 2014

⁸⁰ Sainsbury's help centre, [What is your position on halal meat?](#) as viewed on 3 November 2014 and 18 February 2014

⁸¹ Tesco plc, [Trading responsibly: Religious slaughter](#), updated on 22 May 2014

All of the animals that supply our own label meat are stunned before slaughter, meaning that animals are unconscious and are not subjected to pain.

UK law currently permits slaughter both with stunning and without - a requirement of some faiths. However, to maintain Red Tractor assurance scheme standards, signified by a logo on the label, (which all Waitrose meat & Poultry achieves) all animals must be pre-stunned. New Zealand law also requires all animals to be pre-stunned at slaughter.

Some of our lamb is slaughtered after a Halal blessing, but in line with our strict policies, it is always pre-stunned. This allows us to sell to other markets the parts of the carcass that we don't use. This minimises food waste, keeps prices down for our customers and helps our farmers to be competitive.

To give our customers a choice, our Duchy Originals from Waitrose lamb and the English, West Country & Dorset lamb sold on our service counters is not slaughtered with a Halal blessing. All other Waitrose meat and poultry is non-Halal.

As far as labelling is concerned, there is currently no UK labelling scheme to cover this area and we believe this is a matter where Government should lead. This is because, in order to give consumers clarity, there would need to be a consistent approach to cover not only supermarkets but butchers and other retailers, restaurants, cafes and the food production and catering industry as a whole.

We will be happy to discuss these issues with Government and, of course, to comply fully with industry labelling requirements that may be developed.⁸²

Pizza Express

FAQ: Do you use halal chicken?[No longer featured]

At Pizza Express we are committed to high animal welfare standards and as such all the meat used in our dishes comes from animals which are stunned prior to slaughter.

We use chicken that is halal certified at source – and again to reassure our customers these birds are stunned before slaughter. Our chicken supplier is accredited by the British Retail Consortium, which means it meets the global standard for food safety and legality. None of our other meats are halal and we do not have any halal restaurants.⁸³

Subway⁸⁴

Halal stores

Due to the growing popularity of the SUBWAY® chain, with the diverse multicultural population across the UK and Ireland, we put a programme in place in 2007 to ensure that the population demographic is taken into account

⁸² Waitrose, [What is Waitrose position on halal meat?](#) as viewed on 7 May 2014 and 18 February 2015

⁸³ [www.pizzaexpress.com](#), Customer Service, FAQ as as viewed on 3 November 2014 but not a searchable FAQ on 18 February 2015

⁸⁴ Subway press releases, [Halal stores](#), 30 April 2014

when new store openings are considered in order that we meet consumer demand in each location.

All our suppliers comply with EU animal welfare legislation as a minimum and we require suppliers of Halal products to adopt the stunning of animals prior to their slaughter. All Halal meats are certified by the appropriate Halal authorities.

All Halal SUBWAY® stores have numerous signs stating that they serve Halal food. These are situated on the menu panels, nutritional information and in the front window of the store.