



Slaughter without pre-stunning and animal welfare

Ensuring animals have a good life by advocating on their behalf

Key facts...

- ★ The RSPCA believes that all animals should be effectively stunned before they are slaughtered.
- ★ Scientific research indicates that the slaughter of a sentient animal without pre-stunning can cause unnecessary suffering.
- ★ Whilst slaughter without pre-stunning remains permissible under the law, we would like to see mandatory method of slaughter labelling introduced to allow consumers to decide whether they wish to buy meat from non-stunned animals, as well as improvements made to protect those animals involved during slaughter.
- ★ According to the Food Standards Agency in 2018 there were 20,000 cattle, 3.1 million sheep, and 90.8 million broiler chickens (for meat) slaughtered without pre-stunning in England and Wales.

Introduction

Rules on slaughter in England are set by The Welfare of Animals at the Time of Killing (England) Regulations 2015 (WATOK). Under WATOK, all animals must be stunned (rendered insensible to pain) before they are slaughtered. However, there is an exemption to these rules that allows slaughter without pre-stunning for religious communities. According to the Food Standards Agency in 2018 there were 20,000 cattle, 3.1 million sheep, and 90.8 million chickens (for meat) slaughtered without pre-stunning in England and Wales¹.

There is widespread continuing concern about the existing exemption within WATOK. The RSPCA believes that on the basis of the available evidence indicating the suffering caused by the slaughter of conscious animals, the exemption should be removed and all animals stunned before slaughter.

Welfare concerns

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*”².

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 recent guidelines³, the time taken for animal brains to lose responsiveness is up to 20 seconds in sheep, up to 2 minutes in cattle and up to 2.5 minutes in poultry.

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*”⁴.

Amending WATOK to improve animal welfare

Leaving the EU has presented the UK with greater freedom to set its own rules around animal slaughter and

¹ FSA (2018) [Farm Animals: Survey of Slaughter Methods](#) 2018 (accessed 15/02/21).

² FAWC (2003) [Welfare of Farmed Animals at Slaughter and Killing](#) (accessed 15/01/21).

³ 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](#) (accessed 15/01/21)

⁴ DIAREL Project, K.von Holleben et al (2010) [Report on good and adverse practices – Animal welfare concerns in relation to slaughter practices from the viewpoint of veterinary sciences](#) (accessed 15/01/21).

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the RSPCA would like to see the Government take this opportunity to bring about an end to slaughter without pre-stunning.

However, whilst slaughter without pre-stunning remains it must be ensured that the provisions are used in cases where the religious exemption applies only and we would also like to see WATOK amended to make sure it better protects animal welfare at the time of slaughter. These amendments should include post-cut stunning for ruminants (for example cattle and sheep), minimum stun parameters for poultry, mandatory and effective method of slaughter labelling and improvements around some of the technical details contained within the Regulations (for example on electrical water bath stunners).

Trade deals and exports

We must also ensure that all Free Trade Agreements the UK signs explicitly exclude the export of non-stunned meat or live animals for slaughter without pre-stunning. The derogation from WATOK that allows slaughter without pre-stunning for religious purposes states that the meat from the animals must only be used to meet the requirements of the local religious community. Exporting this meat therefore breeches the intention of this derogation. The latest FSA figures show that the meat from over 750,000 sheep slaughtered without pre-stunning was exported in 2018.

There are useful examples of other countries around the world who have a ban on slaughter without pre-stunning and a flourishing export market. For example, New Zealand has a vibrant export trade in stunned meat to Muslim countries such as Indonesia and Saudi Arabia. New Zealand has prohibited slaughter without pre-stunning for over 10 years and this has not affected their ability to set up trade deals for sheep meat.

Other countries

Looking at other countries there is precedent for introducing bans. For example, in Sweden, Norway, Switzerland, Iceland, Slovenia and Denmark, stunning, including meat for religious communities, is always compulsory before slaughter. In Germany abattoirs are permitted to slaughter animals without stunning only if they show they have local religious customers for the request. To obtain this permission, applicants need to fulfil many requirements: requirements on the slaughterhouse, requirements on the slaughter-procedure, data about species and number of animals.

A recent European Court of Justice ruling found that requiring animals to be stunned before slaughter was not an infringement of human rights. In a challenge to a ban on non-stun slaughter in the Belgian state of Flanders, the Court found that such measures “allow a fair balance to be struck between the importance attached to animal welfare and the freedom of Jewish and Muslim believers to manifest their religion”⁵.

Labelling

The RSPCA believes that consumers have a right to know where their meat comes from, how it was reared, and how it was killed. We would like to see meat sold in supermarkets, shops and other food outlets clearly labelled where non-stun slaughter methods have been used.

Currently, there is no opportunity for consumers to have information on method of slaughter for the meat products they eat. For example, the latest FSA figures show that meat from 90,000 sheep slaughtered for kosher meat were deemed ‘unfit for religious consumption’. It is not clear what happened to this meat subsequently and, without labelling, we will never know if it entered the conventional market. It is also not clear whether meat labelled Halal has come from animals that have been stunned (it should be noted that the majority of meat that comes from Halal slaughter is stunned). ‘Stunned’ or ‘Non-stunned’ are appropriate, non-contentious, factual labels for meat that provide sufficient information for the consumer to make an informed choice.

⁵ European Court of Justice Judgement in Case C-336/19 (Centraal Israëlitisch Consistorie van België and Others), summary available at <https://curia.europa.eu/jcms/upload/docs/application/pdf/2020-12/cp200163en.pdf> (accessed 15/01/21).

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