All-Party Parliamentary Group on Beef and Lamb

Meat Slaughtered in Accordance with Religious Rites

August 2014

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About the Beef and Lamb All-Party Parliamentary Group

The Beef and Lamb All-Party Parliamentary Group is a cross-party group of MPs and Peers which aims to ensure that parliamentarians are fully briefed by industry experts on the latest developments in the beef and lamb sector, including supply chains, exports, sustainability, health and nutrition.

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- Huw Irranca-Davies MP (Vice-chair)
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All-Party Groups are informal, cross-party, interest groups that have no official status within Parliament and are not accorded any powers or funding by it.

Weber Shandwick (a consultancy) is retained by EBLEX, the organisation for beef and lamb levy payers in England, to act as the APPG’s secretariat. The views expressed in this report are solely those of the APPG.

For further information, please contact Andrew Gill on agill@webershandwick.com, or telephone 020 7067 0656.
Foreword

When we as the All Party Parliamentary Group for Beef and Lamb decided to conduct an inquiry into non-stun slaughter in accordance with Religious Rites I knew that we were entering into an area of public discourse that is highly polarised and that provokes passionate responses from both sides of the debate.

We have taken evidence from a wide range of stakeholders including industry experts, Shechita UK, the Halal Food Authority, veterinary professionals as well as the Farming Minister George Eustice and the European Commission.

Whether the right to Freedom of Religious Expression outweighs animal welfare considerations is a highly emotive debate but one worth having in a calm and transparent way. It is for this reason that we have proceeded on the basis that the ultimate aim of the inquiry is to improve animal welfare at the time of slaughter and, we have been careful to make distinctions between the different methods of non-stun slaughter used and what species are being considered, throughout.

There are no easy solutions to what is legally and culturally a very complicated set of circumstances. Our Inquiry has identified several areas where greater research is needed; such as on 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 religious requirements.

The Report also makes a number of recommendations on the matter of labelling and traceability to help consumers from all communities make informed decisions when shopping.

I would like to thank Weber Shandwick (a consultancy) which is retained by EBLEX, the organisation for beef and lamb levy payers in England, to act as the APPG’s secretariat. I would also like to thank all those individuals and organisations who submitted written evidence and who appeared before our oral evidence sessions as well as the other Members of the APPG who took part in this inquiry.

Yours sincerely,

Neil Parish MP
Chairman of the APPG for Beef & Lamb
Executive Summary

The revelations of horsemeat contamination in 2013 highlighted the importance that consumers place on the origin of their food and the trust that they place in retailers in guaranteeing this, and that when this trust is broken it is an issue is felt across the industry. There are a number of stages that an animal passes through from the farm gate to the fork. This inquiry focusses on one particular stage in that journey, that of slaughter of domestic produce in the UK and in particular slaughter that is carried out in accordance with religious rites.

European law currently requires that all animals are stunned prior to slaughter. There is, however, a derogation that permits member states to practise non-stunning in the cases of slaughter in observance with religious beliefs. In addition, the European Commission is currently conducting research into the desirability of labelling for consumers and what the consequences of labelling might be, the results of which are expected by the end of the year. The lively debate in the UK press and Parliament as to what the UK Government should be doing on this matter is indicative of how emotive the subject is on all sides.

This report doesn’t seek to advise on labelling per se, although this does feature in the report’s recommendations as an associated issue and the APPG did seek evidence on this point. Nevertheless, this report focuses on methods used in producing halal and kosher meat from an animal welfare perspective and took evidence along the following lines:

- Is there a difference in the pain experienced by an animal killed without stunning versus one killed with stunning?
- What scientific evidence is available to support the position that one method is more humane than another method?
- Are there any alternative stunning applications e.g. post-cut stunning that could be used as an alternative to conventional, pre-cut stunning. What is the available evidence that these improve or reduce animal welfare?
- How can labelling be improved to enable consumers to make better informed choices about the meat they consume and what information should this labelling contain?
- Are there examples of best practice that the UK can learn from overseas?

Over the course of this inquiry the Group has gathered evidence in response to these questions. We intend that the findings from this inquiry will help MPs, industry, government officials and NGOs take a more balanced and evidence-based approach to policy making when the time comes to take-up the recommendations that follow the European Commission’s research.

It is hoped that this in turn will enable consumers to make better informed choices about the food they consume.
EU Regulation 1099 and member state derogation

European Commission 1099 provides for the protection of animals at the time of killing. The Regulation states: “Where the killing of animals of such species produces food or other products, those operations should fall within the scope of this Regulation”. The Regulation also contains an obligation to stun animals prior to slaughter. There are a number of derogations in this legislation for member states. These relate to human safety at the time of slaughter, as large animals can be dangerous in rare cases, and hunting which is covered by separate legislation. For the purposes of this inquiry, it is the derogation for religious slaughter that is relevant:

“Derogation from stunning in case of religious slaughter taking place in slaughterhouses was granted by Directive 93/119/EC. Since Community provisions applicable to religious slaughter have been transposed differently depending on national contexts and considering that national rules take into account dimensions that go beyond the purpose of this Regulation, it is important that derogation from stunning animals prior to slaughter should be maintained, leaving, however, a certain level of subsidiarity to each Member State. As a consequence, this Regulation respects the freedom of religion and the right to manifest religion or belief in worship, teaching, practice and observance, as enshrined in Article 10 of the Charter of Fundamental Rights of the European Union”.

EU Regulation 1099/2009 is currently being implemented. The UK Government has consulted on proposals to implement the Regulation and has confirmed that it will retain existing national rules for religious slaughter in the Welfare of Animals at the Time of Killing (WATOK) Regulations, where they give greater protection than EU Regulation 1099/2009 on the protection of animals at the time of killing. The inquiry took evidence from the European Commission. Jacqueline Minor, from the European Commission in Representation in London, updated the inquiry that the Commission is considering a request from the European Parliament to undertake a study on the labelling of meat which is slaughtered in accordance with religious rites where the animal has been killed without stunning. This study is ongoing, with results expected to be produced by the end of 2014.

Therefore, the UK Government exercises its right for derogation in the case of religious slaughter. Giving the Government’s response in a debate on the issue, Lord de Mauley said: “While the Government would prefer to see all animals stunned before slaughter, we respect the rights of Jewish and Muslim communities to eat meat prepared in accordance with their religious beliefs.”

George Eustice MP, Parliamentary Under Secretary of State for farming, food and marine environment, clarified this position in evidence to the inquiry. He said: “There has been a longstanding recognition that the rights of those who want to slaughter animals according to religious rites would be respected. We were always clear that our preference would be that all animals are stunned before slaughter, but we recognise that has been a longstanding right. Coming to the most recent regulations, you talk about evidence: there have been a number of reports done in the last decade. I do not think that there is any doubt on the science that, strictly from an animal welfare point of view, stunning is better and that is why we would prefer all animals to be stunned.”

Stunning and non-stunning in religious slaughter

It is inaccurate to say that all religiously slaughtered meat is non-stunned and that religious groups are against stunning. Whilst it is the case that stunning is not permitted for meat to be kosher in the case of Shechita slaughter, Halal does allow for certain forms of stunning in certain species. The Group is clear that careful distinctions have to be made as to what species are being considered and what method of stunning and slaughter is used.

2 http://www.publications.parliament.uk/pa/ld201314/ldhansrd/text/140116-gc0001.htm#14011665000550
3 Parliamentary Under Secretary of State for farming, food and marine environment George Eustice MP, 9th July 2014.
Shechita slaughter, it is argued, does not require any form of stunning as the cut itself “incorporates an integral and irreversible stun by severing the anterior structures of the neck with a rapid transverse incision using a surgically sharp instrument whose length is two and a half times the width of the animal’s neck. This causes an immediate and dramatic fall in cerebral perfusion and immediate loss of consciousness and sensibility to pain.” It is also put that “All methods of mechanical or electrical stunning are prohibited by Jewish law because an animal must be entirely unharmed and healthy at the point of slaughter in accordance with the laws of Shechita.”

However, Halal slaughter does permit some forms of stunning in some cases. Indeed, as the Government has stated, around 80% of the Halal meat produced is stunned. In oral evidence, the Halal Food Authority said, “[We] started to accept stunning on the basis that it was introduced as the tool for mass production, and it was the facilitation of expediency of machinery of science and technology. We were given to understand, by all means, that it was designed not to kill.” However, the group also said that the method of stunning must also be Halal compliant. For example, “captive bolt stunning is not acceptable, because it will smash the brain and that will be in addition to the earlier blow. That would cause death well before the [intended] cause of death [the cut].”

It is important to note that this inquiry accepts that animal welfare is a priority within both the British and the Muslim communities. Indeed, Shimon Cohen confirmed during evidence that “[r]ight at the core of Jewish tradition and Jewish belief is kindness and welfare to animals.”

Methods of stunning

Over the course of the inquiry, a number of different systems for stunning were discussed. However, acceptability under religious rites depends on whether or not the animal is deemed to be alive after the stun is implemented.

Stunning that is acceptable for Halal

As summarised in the previous section, there are methods of stunning that are acceptable to some consumers of Halal. This is only true in the case of sheep and lamb as the principle method of stunning in the UK for cattle, captive bolt, is often not acceptable under Halal for the reasons summarised below. There are a small number of plants that operate electric stunning but it is understood that all use a cardio stun process, which stops the heart and is therefore not Halal compliant.

The inquiry heard that for meat to be Halal, the animal must not die as a result of the stun; it must be the bleed out that is the cause of the death of the animal. Consequently, certain forms of stunning are not acceptable under Halal, for instance captive bolt stunning, which it is argued would in itself kill the animal. As Rizvan Kahlid, Executive Director at Euro Quality Lambs Ltd, summarised:

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4 Shechita UK written evidence
5 http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm140612/debtext/140612-0001.htm#140612-0001.htm_spnew1
6 Halal Food Authority, oral evidence, 6th May 2014.
7 Shechita UK, oral evidence, 13th May 2014.
"If you have electric head to back stunning, that is designed to kill, so that would not be compatible with Halal. The captive bolt stunning, definitely some animals will die as a result of that. Again, you cannot accept that for Halal. These are fundamental issues."

A secondary requirement 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. In relation to electrical stunning, Prof. Neville Gregory said that heart rate can lower during the application of the current, but that the heart rate does return and even increases after this phase:

"If you leave an animal for long enough, after it has been electrically stunned and bled….you usually get the same amount of blood out of an animal regardless of what happened to it in terms of how it was stunned, and how it was cut, and what the heart action is like."

It is also important to note that, for meat to be Halal, the effect of stunning on animal welfare must not be adverse. Witnesses from Halal groups that accept stunning recognised it would serve to limit the amount of pain felt at slaughter, but concerns were registered regarding the effects of mis-stunning on animal welfare. Saqib Mohammed, Chief Executive of the Halal Food Authority, said:

"With regards to the questions posed to us about the pain, on whether you are stunning, or not, the difference in pain experience between stunned and non-stunned animals is that non-stunned meat may experience longer duration of pain from the point of cut, up to the loss of consciousness. We believe that stunned animals, on the other hand, experience pain caused by the effect of the process, which is instantaneous. Most stunned animals may experience prolonged pain if the stunning process is not executed properly. For example, poor position of equipment."

**Recommendation 1**

The Group believes that there is an argument to be made for more research in this area to help understand whether or not the reasons given for these concerns are supported by scientific evidence. The Group therefore calls for research to be undertaken to determine the effect of stunning on the residual blood content left in meat in comparison to that produced from slaughter without stunning. The inquiry understands that there is existing research in this area for sheep but that it needs to be reviewed and anticipates that further work may be necessary, especially on the effect of pre-slaughter stunning of cattle and residual blood content.

**Post-cut stunning**

The inquiry took evidence on the use of post-cut stunning (the application of a stun immediately following the neck cut) as this is one method that can satisfy those who call for mandatory stunning on welfare grounds and those who argue that the cut must be the method that kills the animal. In the written evidence, the British Veterinary Association, who call for a ban on non-stunned slaughter, said:

"BVA recognises that, while pre-stunning is superior in terms of animal welfare, should non-stun slaughter continue to be permitted, post-cut stunning offers a valid means of reducing the suffering of animals at slaughter. Therefore the option of post-cut stunning is not equivalent to pre-cut stunning, but presents a highly desirable option if government policy does not change."

In addition, Prof. The Lord Trees, in oral evidence, said:

"[T]here is now some very convincing evidence from some well-respected veterinary anaesthetists and physiologists in New Zealand which certainly convinced a great many people that the cut without stunning produces responses which have been associated with pain and that stunning

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8 Halal Food Authority, oral evidence, 6th May 2014
9 BVA written evidence
precludes that happening; and if post-cut stunning is done that then abrogates those responses which have occurred following the cut.”

Nevertheless, the inquiry found that the method of post-cut stunning would need to be carefully considered for it to satisfy Halal consumers. In oral evidence, the Halal Food Authority, said:

“With regards to post cut stunning, Halal Food Authority’s position is that bolt stunning may be used to reduce the pain, reduce the duration of pain in slaughtering operations that do not use pre-stunning. We believe that this will significantly reduce the suffering of animals after sticking, in the case of cattle in particular, where the pain activity may last for over a minute after slaughter.”

They went on to caution:

“However, method of post-cut stunning has to be considered as Halal compliant. For example, captive bolt stunning is not acceptable, because it will smash the brain and that will be in addition to the earlier blow. That should have been individual slaughter – that should be because bleed out. That would occur much earlier than actual bleed out cause for death.”

The inquiry found that post-cut stunning is not permitted in the case of kosher. In written evidence, Shechita UK, said:

“The argument for a post-cut stun is unsustainable on welfare grounds since the animal has already been rendered irreversibly unconscious and insensible to pain by Shechita.”

However, when the Group took evidence from Defra it became unclear as to whether or not post-cut stunning did not take place at all in cattle: During oral evidence, George Eustice MP said: “But only a tiny proportion of cattle are post-cut stunned for halal; I think it is only about 1%. I understand that there are particular abattoirs that do shechita that do accept post-cut stunning.”

Sue Ellis, Head of Animal Welfare at Defra, went further and said: “...in 2003 or 2004 red meat slaughter report, it actually referred to the point that the Minister made: that there were, with rabbinic permission, some animals being stunned, if you would like that reference.”

The Group is convinced that there is merit in the case for post-cut stunning, but given the issues raised for pre-stunning exist also in the case of post slaughter there is, at this stage, no need for investigation. In addition to that which is needed to understand the scientific basis for claims against pre-stunning and particular forms of stunning required for particular species, such as captive bolt for cattle. Nevertheless, clarity on whether or not post-cut stunning has taken place in cattle in the UK slaughtered in accordance with religious rites would be welcome.

**Recoverability**

As summarised above, one of the issues associated with stunning for Halal consumption is how to demonstrate that an animal is not killed at the point of stun, and in particular that it is not the stun that kills the animal, rather the bleed out.

One of the methods that can be used to demonstrate that the stun does not kill the animals is the ability to demonstrate the animals recovery post stunning. Demonstration of recoverability is not currently permitted with in the UK but has previously been permitted (and remains permitted although rarely used) in New Zealand and a number of witnesses drew reference to this. This may create a challenge for producers of stunned Halal meat in convincing customers that their product is Halal when they are unable to prove it.

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10 Prof. The Lord Trees, oral evidence, 13th May 2014
11 Halal Food Authority, oral evidence, 6th May 2014
12 Shechita UK written evidence
13 Parliamentary Under Secretary of State for farming, food and marine environment George Eustice MP, 9th July 2014.
Recommendation 2

The Group recommends that the ability to demonstrate recoverability in UK abattoirs should be considered as a means to reassure consumers that head only stunning does not in itself kill the animal.

Operator safety

An issue associated with head-only electrical stunning for larger animals, in particular cattle, is the safety of the operatives carrying out the stun. This is an issue that was highlighted by Halal groups consulted and Prof. Gregory who has experience in different systems used overseas. Prof. Gregory said:

“The major problem we have had on the electrical stunning is the kicking. When you have kicking cattle, it is very dangerous. The way that is managed in New Zealand, or the system they developed was electro immobilisation. So they would stun them; they would drop out of a box; they go on to a conveyor where they have a rump electrode which comes and makes contact with the back end, and another electrode on the neck, and then they are immobilised and you can make the cut without fear of getting an electric shock yourself as well.”

Prof. Gregory also highlighted that this is not something currently permitted under EU law:

“Now, under EU regulations, that would not be allowed because you are not allowed to immobilise. You are not allowed to do any procedure between stunning and sticking, such as immobilisation. But that does not apply in New Zealand and Australia. They get on with it. They do it. [It] works very well.”

Recommendation 3

The Group recommends a re-examination of electro-immobilisation to determine scientifically whether the perceived hazards of an animal being unable to demonstrate its consciousness justify its prohibition. The Group is clear that animal welfare must always be considered as a top priority. Alternatively, other methods should be developed to help manage carcass kicking.

The cut as stunning: as argued in the case of Shechita

It was argued, during the inquiry, that the Jewish form of slaughter does in itself serve to stun the animal. Shechita UK, in written evidence, said:

“Shechita incorporates an integral and irreversible stun by severing the anterior structures of the neck with a rapid transverse incision using a surgically sharp instrument whose length is two and a half times the width of the animal’s neck. This causes an immediate and dramatic fall in cerebral perfusion and immediate loss of consciousness and sensibility to pain.”

In oral evidence, Shechita UK pressed this further:

“[T]he European Union definition of stunning in this context is ‘any intentional process that causes a loss of consciousness and sensibility without pain including any process resulting in instantaneous death’. Therefore we believe that the Shechita method that stuns, dispatches and exsanguinates in

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14 Prof. Neville Gregory, oral evidence, 6th May 2014
15 Prof. Neville Gregory, oral evidence, 6th May 2014
16 Shechita UK written evidence
one action conforms entirely with the European Union definition of stunning as laid out in Regulation 1099.”

The inquiry learned that stunning and killing in one act is not included in the list of accepted forms of stunning that are regulated by the European Union. The inquiry also learned that Shechita is permitted in the United States of America as a humane form of slaughter in its own right, and not as a derogation.

During oral evidence, a veterinary advisor at Defra, said that much of the existing research focussing on pain at slaughter has been done in conjunction with halal slaughter, and that the Department has not managed to collate research from shechita slaughter.17

Recommendation 4

Research indicates that pain-like signals are present in the EEG of the brain of bovines for an average of 34 seconds following the neck cut. However, the work was not able to test whether the cut itself caused pain because of the movement artefacts in the EEG at the time the cut was delivered. Therefore, there is a knowledge deficit as to whether or not the cut is painful which the Group believes should be further researched to address.

Mis-stunning and mis-slaughtering

Many of the religious groups consulted raised concerns that dangers of mis-stunning represent a threat to the welfare of the animal that means stunning should not be permissible.

Recommendation 5

The Group understands that these are legitimate concerns and believes that statistical data on mis-stunning be made available. This specifically relates to prolonged consciousness following the stun. It is also the case that mis-slaughtering (failure to sever all blood vessels) is an issue that arises in the cases of religious and non-religious slaughter, both stunned and non-stunned. The Group believes that statistics on the incidence of mis-slaughtering would need to be made available to see if it is higher or lower under certain methods.

Guidelines and enforcement

Over the course of the inquiry questions were raised over the requirement for the Government to produce guidelines for those practicing slaughter in accordance with religious rites, in particular for slaughter without stunning. The Group understands in evidence taken from Defra that there is such guidance and that it is developed in conjunction with a sub-committee of the Farm and Animal Welfare Committee, in particular on restraining pens for bovine slaughter. However, there does appear to be a lack of advice and guidance available for slaughtermen on methods for actually cutting the animal’s neck.18

Questions were also raised as to how to check that guidelines are being implemented. In evidence, George Eustice MP cautioned against mandatory requirements on Animal Welfare Officers implementing a stun if the animal is still alive after 90 seconds of the neck being cut, as is the case in some European countries, as this would not allow them to act with the discretion that is needed for them to do their jobs.

Questions were also asked as to the Government’s position on CCTV in slaughterhouses, including those carrying out slaughter in accordance with religious rites. On this point, George Eustice MP said: “we do not rule out doing this, but it was part of our consultation, before my time, some 18 months ago when we looked at all of the issues around slaughter. On the basis of the responses to that consultation, there was a conclusion that having CCTV per se was not necessarily going to improve things, firstly, because it is no good just having cameras running; you have also got to monitor that footage, and you have got to make sure that

17 Defra veterinary adviser, 9th July 2014
18 Defra veterinary adviser, 9th July 2014
you are able to do that. Secondly, some of the concerns raised, and some of the exposés, have actually taken place in abattoirs where you already have CCTV.’

\[\text{Recommendation 6}\]

The Group recommends that the Government conducts a review of the guidelines that are available to slaughtermen who slaughter animals in accordance with religious rites. The Group welcomes that the Government is open to the use of CCTV in slaughterhouses in order to make sure that there is oversight of operations where the veterinary officer is unable to oversee all operations; and following on from its previous consultation the Group would urge the Government to review its decision not to bring forward new legislation in this area.

\[\text{Measurement of pain}\]

\[\text{Research}\]

Given the stated purpose of the inquiry was to look at the issue of meat slaughtered in accordance with religious rites through the prism of animal welfare, the inquiry took a quantity of evidence on the subject of the level of pain felt at the point of slaughter. As noted above, animal welfare is an issue that matters to advocates on all sides of the debate, and research was cited that supports each viewpoint.

Both Shechita UK and the non-stun Halal groups referenced research conducted in Germany by Wilhelm Schulze at the University of Hanover, which suggested that religious slaughter is a humane method. However, all groups consulted suggested that it was problematic to try and quantify “pain” and religious groups made the case that an animal can suffer a higher degree of pain in the case of mis-stunning. In its written response, Shechita UK said:

“It is impossible for any scientific study to make an accurate or conclusive assessment of pain felt by an animal at the point of slaughter because pain is a subjective phenomenon and there are no definitive objective ways of quantifying it.”

Their written response went on to state:

“There is no conclusive scientific evidence to support the position that one method is more humane than another method.”

However, during the evidence sessions, animal physiologist Prof. Neville Gregory, BSc, PhD, and Prof. The Lord Trees, a former President of the Royal College of Veterinary Surgeons, suggested that there was evidence to support the welfare case for stunning. Prof. Gregory said:

“There has been evidence that has shown that, during the bleeding period, there are pain-like signals going to the brain. So, there is concern there. If you apply electro immobilising current, there is a good chance – it is not definite though – there is a good chance you would wipe out the signals going to the brain causing pain. Good chance, but it has not been proven.”

\[\text{Methods of cutting: issues in cattle}\]

Another area highlighted in the inquiry in relation to pain is the method of the cut itself. Prof. Gregory referenced the need for more research in this area. This is particularly true in the case of cattle which, due to their size and the fact you cannot sever the vertebral artery, blood pressure to the brain persists and cattle take longer to lose consciousness following the cut. There are a percentage of cattle, around 10%, that stay conscious for a significantly longer period, due to vertebral artery running alongside the

\[19\text{Shechita UK written evidence}\]
vertebral column supplying blood to the brain when the carotid arteries are cut and when blockages or occlusions occur in the cut vessels that prolong bleed out.

Prof. Gregory referenced that the place of the cut could serve to mitigate the risk of a delay in the loss of consciousness in cattle. During evidence, he referenced Halal abattoirs in China, Sumatra and France that implement a higher cut. Although this cut may take place above the larynx which means the animal can still vocalise, these animals show less risk of occlusion of the carotid arteries and they bleed more freely than where a lower cut takes place. Dr A Majid Katme of the Islamic Medical Association agreed that more research was needed into the best method.

One aspect that Prof. Gregory said has yet to be studied is the level of pain caused by the cut itself. He said: “Nobody has addressed that from a scientific perspective. Nobody has approached that”.

Therefore, there is a challenge to be met in terms of collating and interpreting various pieces of research into the level of pain felt at the point of the cut, whether stunned or non-stunned, particularly in the case of cattle where there are concerns from a welfare point of view.

Recommendation 7

There is research which indicates that pain-like signals are present in the EEG of the brain for an average of 34 seconds following the neck cut in bovine animals. In addition to more research in this area, there are other measures that the Group would like to be investigated. These are the mandatory assessment of knife sharpness using an objective method, and guidelines should be developed on how religious slaughter shall be performed. These guidelines could include reversible stunning methods for Halal, particularly for cattle. The Group understands from evidence taken from the European Commission that an EU funded research project called DIALREL collected data on these practices and provided a series of technical recommendations to perform slaughter without stunning.

Labelling

The inquiry took evidence on the issue of food labelling as this is being consulted on at a European level. The Group was particularly interested in how labelling might be improved to better inform consumers about the meat that they are eating and what information this labelling should contain.

The inquiry took a range of responses on this issue. The Halal Food Authority recommended caution in considering labelling as it could easily lead to a rejection of stunned meat by most Muslim consumers. This view was echoed by Dr A Majid Katme, of the Islamic Medical Association (IMA), who, in his oral evidence, pressed the case for labelling as it would help to inform Muslims that a lot of lamb is stunned and is, in his view, not Halal. In their written submission the IMA said that this would reassure Muslims that their meat is Halal (non-stunned) and suggest that labelling should also include meat that was stunned and include the method of slaughter. However, this view was taken further by Shechita UK and the Association of Non-stun Abattoirs, who argued that this would be inconsistent and that a truly comprehensive and equitable food-labelling system which informs consumers of all methods of slaughter, would be fair – religious or otherwise. They said:

“It seems incongruous to us to pre-suppose that consumers’ rights do not extend to informing them that an animal has been slaughtered by mechanical methods, or mechanically stunned prior to slaughter by captive bolt shooting, gassing, electrocution, drowning, trapping, clubbing or any of the other approved methods. Similarly consumers would want to be informed if the animal endured repeat stuns if the first attempt was ineffective. Incidences of mis-stunning are recorded in slaughterhouses by law.”

The Group also consulted with the British Meat Processors Association (BMPA) on this point. The BMPA are opposed, in principle, to compulsory labelling requirements, not just in relation to method of

20 Halal Food Authority written evidence
21 Shechita UK written evidence
slaughter, as it adds an administrative burden for processors and would not allow consumers to make an informed choice. In evidence, the BMPA said:

"BMPA is also not in favour of labelling meat from non-stunned animals as the next step would be the labelling of the method of slaughter. We strongly believe that most consumers have no wish to know the details of how animals are slaughtered and it would not be in industry's interests for labelling to extend into this area."

The inquiry took evidence from Jacqueline Minor, from the European Commission in London, on the topic of labelling, given that research is currently ongoing at the European level. Jacqueline clarified that the background and purpose of this research was not to look into scientific or animal welfare issues related to slaughter, or the prevalence of religious slaughter, but rather to focus on the desirability of labelling amongst consumers and the consequences of labelling. Jacqueline also informed the inquiry that the research reflected that there are issues around the amount of information that consumers wish to receive and that this should be borne in mind, and that information is needless if it does not help the consumer make an informed decision. Jacqueline also said that labelling would require member states to keep records of how much meat is produced with and without stunning, something that they are currently not required to do.

During oral evidence, George Eustice MP clarified the Government’s position on labelling: “The conclusion we reached at the moment is that any labelling method of slaughter – which is a bit of a misnomer, which I will come onto – is best applied at a European level, otherwise you get all sorts of complication. I think France had attempted at one point to do some national scheme that slightly came unstuck with European rules. Our view is that it is best done at a European level. The European Commission have a working group looking at this as we speak. They had hoped, initially, to report later this summer. Paradoxically, as a result of heightened debate on this issue here in the UK, they are taking a little longer to consider this issue, and we now do not anticipate that they will report until the end of the year. Our view is that we should wait and see what recommendations they make before reaching a decision on that."

Recommendation 8

It is the Group’s belief that, if labelling is to be considered, it should be done so on a stun vs. non-stun basis, not on a Halal vs. kosher basis, as it is understood that there is sufficient understanding amongst consumers of what these terms mean. The Group does, however, believe that more work can be done to clarify for consumers of Halal and kosher, and the wider public, of what and these terms specifically entail. This is particularly the case for Halal where there is disagreement with regards permissibility of stunning. The inquiry understood that if labelling were to require the type of stunning, then this would help to inform consumers of Halal products due to the differences in permissibility.

The Group also agrees that due attention is paid to the burden that would be placed on the industry to provide increased labelling and that this is only pursued if a compelling case can be made that it is in consumers’ interest.

Recommendation 9

The Group recommends a consumer attitudes survey towards meat labelling 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.

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22 British Meat Packers Association written evidence
23 Parliamentary Under Secretary of State for farming, food and marine environment George Eustice MP, 9th July 2014.
Certification bodies

The inquiry highlighted that there is disagreement amongst Halal groups on what constitutes Halal and there are issues in relation to this when it comes to the question of labelling. During evidence sessions the case was made of the need for a single Halal certifying body in the UK. It was noted that the Rabbinical Commission (established under the Slaughter Houses Act 1974) oversees the licensing of Shochetim (trained slaughtermen who carry out Shechita slaughter).

Dr A Majid Katme, in evidence, said: “The word Halal is not protected under EU law. A Muslim certifying body in Britain is very much needed.”

Another issue that would have to be considered would be the compatibility of existing labelling and food assurance schemes. During oral evidence Rizvan Khalid, Executive Director of Euro Quality Lambs Ltd, said:

“All of the supermarket own labels .... they all carry a Red Tractor, which mandates stunning. So, they are food assurance labels. The vast majority of retailers use the Red Tractor as a base standard on top of which they lay their own retailers standards on. If you see that tractor logo, then that meat will definitely be stunned”.

Non-stunned meat entering the main food chain

Although the primary purpose of this inquiry was to establish what evidence there is to support one method of slaughter over another on animal welfare grounds, there have been a number of recent news articles that highlight there are matters of public interest in relation to consumers being aware of the origin of the meat that they are purchasing.

There were reports that some retailers were buying Halal-only chicken and were not making this information sufficiently available to consumers, although it was established that this was stunned Halal. Whilst it has not yet been alleged that non-stunned meat has entered into the main food chain, the inquiry did raise concern on this point and take evidence which provides some clarity on the non-stun supply chain, though further investigation is needed. Prof. Lord Trees said:

“The problem with labelling is that there is an awful lot of meat produced by the Jewish method of killing and the Islamic method which is actually consumed by other people without their knowledge of how that meat has been derived. That is the problem about labelling. It is not a problem for people of the Jewish or Islamic faith; it is a problem for those of other faiths. Sikhs, for example, particularly expressly forbid that meat has been ritually slaughtered.”

During oral evidence, Rizvan Khalid, Executive Director of Euro Quality Lambs Ltd, said that this was unlikely as the market meant there was not a surplus of non-stunned meat. He said:

“In my opinion, it is highly unlikely for the non-stunned Halal meat to get into the mainstream market, because there is not enough non-stunned Halal being produced for the Halal customers.”

One area that is particularly problematic relates to Shechita. It is part of the Jewish faith that the hind quarters of an animal are not kosher and are therefore not consumed by the Jewish population, despite the animal being slaughtered under non-stun Shechita methods. On this point, during evidence, Shimon Cohen, Chief Executive of Shechita UK, said:

“You benefit from that. Well, actually you do not benefit from it because the majority of what we do not eat, of the 20,000 cows, gets sold into the Muslim community. The rest of the 20,000 cows that we kill may or may not end up either in pet food or in a meat pie somewhere. It is possible. We have no problem whatsoever with that being labelled however you want to label it, as long as it is not
However, Prof. Gregory noted that there may be issues with animals slaughtered under Shechita entering the main food chain, especially in circumstances where there is a fast throughput of carcasses. For meat to be kosher, it is required that the carcass is unblemished. During bedika [inspection] of the lungs the bodek [inspector] is primarily looking for perforations in the pleura enveloping the lungs and for signs that there might have been pleural adhesions. Minor pulmonary haemorrhages are common in shechita-slaughtered cattle and presumably they would not necessarily be a cause for withholding the whole carcass from the kosher market. During a fast throughput Prof. Gregory highlighted that whilst the lungs were being inspected, a number of carcasses may go by that are not inspected and therefore are not passed as being fit for kosher meat.

On this point, it is important to note that all beef slaughtered in accordance with Shechita in the UK is non-stunned, but this is not true for Halal.

**Conclusion**

The Group believes that the debate and coverage in the press to date on the topic of meat slaughtered in accordance with religious rites has been polarised and that a broader and more measured view needs to be taken. This inquiry was therefore undertaken with a specific focus on animal welfare although it does take into account other issues arising from this. It is intended that the information gathered over the course of this inquiry will help to inform this debate and provide Her Majesty’s Government with a body of evidence that will provide a useful aid when it considers and implements legislation from the European Union.

The Group is in agreement with the Government that whilst it is preferable that all meat is stunned before slaughter, it is to the benefit and pride of the United Kingdom that religious freedoms allow communities to eat meat prepared in accordance with their religious rites.

What the inquiry has done is consult with the relevant groups that are stakeholders in this debate and collate their views. The call for written evidence and oral evidence sessions has brought these groups together to analyse the scientific basis of their respective positions. In order to help these groups better articulate their positions and advance the debate along the grounds of scientific evidence, the Group advocates that there is research and further analysis to be undertaken on the measurement of pain in animals at the time of slaughter.

The inquiry highlighted concerns amongst religious groups that the bleed-out of the carcass is affected by stunning. It was suggested by the experts consulted that this belief is unfounded, but there is research to be done. The Group therefore calls for existing 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 [Recommendation 1].

Another concern raised in relation to captive bolt stunning is that this would effectively act as the wound that kills the animal which is not permitted under religious requirements. Research needs to be conducted to establish if there are methods of recoverable stunning for cattle that would be acceptable to some Halal customers, acknowledging that no form of stunning is considered acceptable to Jewish consumers.

Whilst the Group is convinced of the merits of post-cut stunning in religiously slaughtered meat where there are concerns that the stun would kill the animal, it is felt that further research in this area is not currently required in addition to research into methods used at the pre-cut stage.

Many groups consulted highlighted the need to prove recoverability as a means to assuring consumers of religiously slaughtered meat that the animal was alive at the point of slaughter. The Group therefore
recommends that an investigation into the impact of such a requirement in UK abattoirs should be considered [Recommendation 2].

The Group took evidence on the use of electro-immobilisation, a practice that is not currently permitted in the UK. The Group understands that there is not just a religious concern that electro-immobilisation may obscure the consciousness of the animal at the point of slaughter and that there is a wider animal welfare concern to this. However, it is recommended that this measure is 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. If it is deemed that electro-immobilisation remains to be not permitted then other methods to help manage carcass kicking should be considered [Recommendation 3].

It was widely agreed that there are challenges in providing and accurate and accepted assessment of pain following the cut, although many of the groups consulted cited research to back up their positions on stunning and non-stunning. The Group therefore recommends a review of this research, including that conducted in the UK and overseas. It is also acknowledged that there is a research deficit on the subject of pain felt as a result of the cut itself. The Group believes that more research is required in this area, especially as it has been argued that the Shechita method, which does not permit stunning, does not cause pain at the point of the cut [Recommendation 4].

The inquiry heard concerns on all sides concerning mis-stunning and mis-slaughtering. To help reassure these groups and inform the debate on this point the Group believes that statistics on the incidence of mis-slaughtering is made available [Recommendation 5].

The inquiry took a great deal of evidence on the point of labelling to help aid consumers in their purchasing decision. It is the Group’s belief that if labelling is to be considered, it should be done so on a stun vs. non-stun basis, not on a Halal vs. kosher basis, as it is understood that there is sufficient understanding amongst consumers of what these terms mean. The Group does, however, believe that more work can be done to clarify for consumers of Halal and kosher, and the wider public, of what and these terms specifically entail; this is particularly the case for Halal where there is disagreement with regards the permissibility of stunning [Recommendation 6]. The inquiry understood that if labelling were to require type of stunning then this would help to inform consumers of Halal products.

The Group also believes that an impact assessment on the burden to industry would need to be undertaken as a result of any proposals in relation to mandatory labelling, and that first a consumer attitudes survey to labelling would be required to help inform what information would be desirable on labelling [Recommendation 7].