

Non-stun Slaughter

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Introduction

In the UK, there is a legal requirement to stun animals before slaughter. Stunning, which can involve delivering an electrical current or percussive blow to the brain, ensures that the animal is rendered unconscious before they are killed. However, there is an exemption to the law for animals that are slaughtered in accordance with religious rites to be consumed by UK Jewish and Muslim communities.¹ Each year approximately 108 million animals are slaughtered without pre-stunning in the UK using this provision. The vast majority of these animals are killed for halal-certified meat and the rest for kosher-certified meat. The majority of non-stunned animals are broiler chickens (~104 million) though many sheep, layer hens, turkey, goats, cattle, calves, and other poultry are also slaughtered without stunning.² These exemptions are intended to meet the demand of faith communities. However, the production of non-stun meat exceeds demand from these communities, resulting in the unnecessary slaughter of millions of animals using these methods.

Background

Types Of Religious Slaughter

The Jewish slaughter practice of shechita is the procedure of slaughtering permitted (kosher) animals according to Jewish religious laws and traditions. This process involves cutting the animal's throat using a sharp knife and keeping it restrained until it has bled out. Certain practices, such as pausing during the cut or cutting in the wrong location on the neck are forbidden. The process is done without any pre-stunning, meaning that the animal is fully conscious when their throat is cut.³



¹ The Welfare of Animals at the Time of Killing (England) Regulations 2015.

²RSPCA. *Improving the welfare of farm animals at the time of their death.* https://www.rspca.org.uk/documents/1494939/7712578/Non+Stun+Slaughter+Briefing.pdf/dec09ee6-9766-bc17-bbd3-6b637472110d?t=1577097683819

³ Aghwan, Z. A. & Regenstein, J. M. Slaughter practices of different faiths in different countries. *Hanguk Tongmul Chawon Kwahakhoe Chi* **61**, 111–121 (2019).

The Muslim halal slaughter practice known as zabiha is the procedure of slaughtering halal acceptable animals according to certain religious rules. Similar to shechita slaughter, halal slaughter requires the cutting of the throat with a sharp knife followed by time to allow the blood to flow out.³ Certain other rules must also be followed, for example, slaughter should be done by an adult Muslim and the name 'Allah' must be invoked at the time of slaughter.⁴ There is some debate within the Muslim community about whether pre-stunning is allowable. One of the principal arguments put forward against stunning is that stunned animals could die before slaughter, thereby violating a requirement of halal that the animal must be alive at the time of slaughter. However, the use of electrical methods of stunning, which animals are able to recover from, is accepted by many Muslims as well as large halal certifiers in the UK such as the Halal Food Authority.⁵⁻⁷ As a result, 58% of the animals killed using halal methods in the UK in 2018 were pre-stunned (note: this figure does not include some chickens, who are stunned ineffectively in an electrical water-bath during halal slaughter).^{2,8}

It is worth noting that fish are generally exempt from both forms of religious slaughter. In Judaism, fish are exempt from shechita as 'fish were created out of the water, and are rendered fit without any ritual slaughtering'. For practitioners of Islam, whether all fish or only some fish are considered halal is largely dependent on the denomination. There is agreement amongst both of the main denominations of Islam, Sunni and Shia, that fish do not require zabiha, meaning that death by asphyxiation is halal. However, there are conflicting sources on whether all fish is halal regardless of how it died, if the fish should die outside of the water, or should die in a net. This prohibits some forms of in-water stunning, though out-of-water stunning, the most common method in the UK, is considered halal. Given the general agreement that fish are either halal or kosher by default or that existing stunning methods are compliant, fish will not be a focus of this report.

⁹ Shurpin, Y. Why Don't Fish Need Shechitah? https://www.chabad.org/library/article_cdo/aid/2978931/jewish/Why-Dont-Fish-Need-Shechitah.htm (2015).



⁴ Islamic Method Of Slaughtering. *Department of Halal Certification EU* https://halalcertification.ie/islamic-method-of-slaughtering/

⁵ Anil, M. H. Religious slaughter: A current controversial animal welfare issue. *Anim Fron* **2**, 64–67 (2012).

⁶ Compassion in World Farming. Briefing - Religious Slaughter. https://www.ciwf.org.uk/media/3818629/religious-slaughter-briefing.pdf

⁷ FAQs. *Halal Food Authority* https://halalfoodauthority.net/FAQs.html

⁸ FAQs - Halal chicken slaughter. Compassion in World Farming https://www.ciwf.org.uk/contact-us/faqs-halal-chicken-slaughter/

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Animal Welfare During Non-Stun Slaughter

The scientific literature shows that non-stun slaughter causes intense suffering to the animals involved. There is ample evidence to show that animals remain conscious for some time after their necks have been cut and that during this time they experience significant pain and distress.

In 2003, the Farm Animal Welfare Council (now the Animal Welfare Committee) reported on the welfare of (red-meat) farmed animals at slaughter. The Council observed that during non-stun slaughter:

'…such a drastic cut [across the neck] will inevitably trigger a barrage of sensory information to the brain in a sensible (conscious) animal. We are persuaded that such a massive injury would result in very significant pain and distress in the period before insensibility supervenes.' ¹⁰

The report also highlighted the time taken for loss of brain responsiveness in non-stunned animals after their necks have been cut. Sheep can take 5-7 seconds to become insensible, goats can take 3-7 seconds, adult cattle can take from 22-40 seconds, and calves up to 120 seconds. In a later report on poultry welfare at slaughter, the Council concluded that birds are likely to be conscious for 20 seconds or more after their neck is cut without stunning. All animals will undoubtedly suffer significantly while they are still conscious and the blood is draining out of their bodies.

Since the publication of the Farm Animal Welfare Council report, other studies have demonstrated the welfare issues associated with non-stun slaughter. A 2010 study found that 8% of cattle who had been cut using the halal method took 60 seconds or more to finally collapse while 14% of individuals collapsed but then stood back up before collapsing again. The average time to collapse for all cattle was 20 seconds, though time to become fully unconscious could be even more. Another study found that 69% of the cattle examined after halal slaughter had aspirated blood into their respiratory systems, raising concerns about the suffering caused by the irritation of having blood in the airway. Several recent studies on cattle have shown that cortisol levels (an indicator of stress) were higher in animals who experienced slaughter using shechita or halal methods compared to those who were pre-stunned. Another studies on the cattle studies on the cattle have shown that cortisol levels (an indicator of stress) were higher in animals who experienced slaughter using shechita or halal methods compared to those who were

¹⁰ Farm Animal Welfare Council. *Report on the Welfare of Farmed Animals at Slaughter or Killing Part 1: Red Meat Animals.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/325241/FAWC_report_on_the_welfare_of_farmed_animals_at_slaughter_or_killing_part_one_red_meat_animals.pdf (2003).

¹¹ Farm Animal Welfare Council. *Report on the Welfare of Farmed Animals at Slaughter or Killing Part 2: White Meat Animals*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/326745/FAWC_report_on_the_welfare_of_farmed_animals_at_slaughter_or_killing_part_two_white_meat_species.pdf (2009).

¹² Gregory, N. G., Fielding, H. R., von Wenzlawowicz, M. & von Holleben, K. Time to collapse following slaughter without stunning in cattle. Meat Sci. 85, 66–69 (2010).

¹³ Gregory, N. G., Wenzlawowicz, M. von & Holleben, K. von. Blood in the respiratory tract during slaughter with and without stunning in cattle. Meat Sci. 82, 13–16 (2009).

¹⁴ Barrasso, R. et al. Evaluation of the animal welfare during religious slaughtering. Ital J Food Saf 9, 8387 (2020).

¹⁵ Ceci, E. et al. Determination of plasmatic cortisol for evaluation of animal welfare during slaughter. Ital J Food Saf 6, 6912 (2017).

¹⁶ Bozzo, G. et al. Analysis of Stress Indicators for Evaluation of Animal Welfare and Meat Quality in Traditional and Jewish Slaughtering. Animals (Basel) 8, (2018).

The evidence shows that animals remain conscious for a significant period of time after their neck is cut in non-stun slaughter. During this time they experience pain and distress which would be avoided by rendering them unconscious with a stun. The obvious and severe consequences of slaughtering animals without stunning led the Farm Animal Welfare Council to conclude in 2003 that 'slaughter without stunning is unacceptable'. On this basis, the existing evidence refutes claims that slaughtering animals with shechita or halal methods constitutes stunning as these processes are not instantaneous and cause unnecessary suffering. Given this evidence it is an urgent priority to match production to religious needs and minimise the number of animals being killed in this way.

Non-Stun Slaughter Supply and Demand in the UK

The significant suffering caused by non-stun slaughter means that it is imperative that the number of animals killed through this non-stun slaughter method is reduced to the minimum quantity needed to meet the consumption of faith communities in the UK.

Survey data collected by the Food Standards Agency found that in 2018, 25.02% of sheep, 9.68% of broiler chickens, 1.07% of cattle, 0.52% of turkeys, and 1.00% of other poultry were killed using religious non-stun methods. In addition, a further 46.24% of sheep, 12.55% of broiler chickens, 2.62% of cattle, and 0.56% of 'other poultry' were killed using halal stun methods.

Slaughter Method	Broiler Chicken	Other Poultry	Turkey	Sheep	Pigs	Cattle
Shechita non-stun	0.28%	0%	0.52%	0.09%	0%	0.46%
Halal non-stun	9.40%	1.39%	0%	24.93%	0%	0.61%
Total non-stun	9.68%	1.39%	0.52%	25.02%	0%	1.07%
Halal stun	12.55%	0.56%	0%	46.24%	0%	2.62%
Total religious slaughter	22.24%	1.95%	0.52%	71.26%	0%	3.69%



¹⁷ A Guide to Shechita. https://www.shechitauk.org/wp-content/uploads/2016/02/A_Guide_to_Shechita_2009__01.pdf (2009)

¹⁸ Department for Environment, Food and Rural Affairs. *Results of the 2018 FSA Survey into Slaughter Methods in England and Wales.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778588/slaughter-method-survey-2018.pdf (2019).

A simple comparison between these figures and statistics on the proportion of the Muslim and Jewish communities in the UK population for the same year - 5.17% and 0.52% respectively - indicates a huge oversupply of non-stunned meat in the UK. The non-stun supply alone is 60% more than these population figures would suggest. The total meat supply, killed with religiously approved slaughter methods (including halal stun), is more than four times the proportion of Muslim and Jewish people in the UK. The level of halal stun slaughter, which requires that the animal is able to regain consciousness after the stun, indicates significant oversupply as these communities have a large amount of approved meat available for consumption. Thus the oversupply of non-stun meat is in fact likely to be higher than the non-stun figure implies as many Muslims consume halal stun meat as well as or instead of non-stun products. To gain an accurate picture we have also estimated the demand for halal and kosher animal products while including consideration of UK imports and exports of meat.



Muslim and Jewish communities do not consume products derived from pigs, therefore placing pork, which makes up 35% of general UK consumption, with other types of meat. This means that a simple comparison between population and consumption percentage is not accurate, as their meat preferences vary considerably compared to the rest of the population. Taking into account different preferences between demographics in the UK population, we estimate that the Muslims and Jewish community consume 6.9% of chicken, 22.4% of lamb, 3.2% of cattle, and 4.8% of other meat in the UK.²⁰

The UK also imports and exports a large number of animal carcasses every year. Exports decrease the total supply of non-stun religious slaughter products available for Muslim and Jewish communities in the UK while also demonstrating that the non stun slaughter of animals is taking place on animals not intended for local consumption. In the Food Standards Agency survey, sheep were the only animal that were recorded as being exported after non-stun slaughter, with ~24% of non-stunned meat being exported (~750,000 sheep per year)¹⁸. This represents about 6% of total UK sheep meat production.

The import of non-stun products is more difficult to estimate. Imports are only monitored in tonnage and data is not available on the percentage of this that is non-stunned. In total the UK imported 1,643,000 tonnes of meat in 2020, corresponding to an estimated 300 million individuals. This represents an additional 40% supply for meat beyond domestic production. Given the lack of data on imports, some unknown number of these individuals are slaughtered without stunning. Depending on the fraction of imports that are non-stun this could greatly increase the oversupply of non-stun meat in the UK. The lack of accurate figures is in and of itself an indictment of the current system, highlighting the lack of concern for the oversupply of non-stun meat by consecutive governments.



¹⁹ Yates, J. Halal consumption increasingly crucial to UK sheep industry. https://www.fwi.co.uk/business/halal-consumption-increasingly-crucial-uk-sheep-industry (2016).

²⁰ Supply and Demand for relgious slaughter in the UK. https://docs.google.com/spreadsheets/d/1vqVB2Y8JXfCYVZoLf_p7Vz2T8colz-oyDozbyB9egAs/edit

When accounting for all these factors, the supply of non-stun slaughter still exceeds demand. This is particularly evident if we consider that halal slaughter using stunning already satisfies a large proportion of the requirements for some of the Muslim community. As high as three times the number of chickens and sheep are halal or shechita slaughtered each year than would be necessary to meet Muslim and Jewish demand.²⁰ Given the assumptions above, this leaves a minimum of approximately 35 million animals unnecessarily killed with non-stun methods each year, or a 33% oversupply.

There are still some additional layers of complexity, both of which are likely to increase the oversupply. First, there is the number of individuals from the Muslim community who exclusively consume non-stun halal slaughter meat compared to halal stunned slaughter. Survey data suggest that 76% of the Muslim community reject stunning²¹, leaving about one quarter of the community who accept stunned meat. However, this low acceptance of stunning is likely to be an underestimate, as suggested by other sources: 'Half of halal consumers are unsure whether they currently buy stunned or non-stunned halal meat; for them it is enough that meat is labelled 'halal" while an additional '15% of halal consumers say they buy stunned halal meat'.²² More generally, it is important to consider what percentage of the Muslim and Jewish communities find non-religious slaughter methods acceptable. Here, surveys have found that between 81-93% of the Muslim community only consume halal meat^{19,22,23} If these figures are used then the oversupply is 56 million animals every year, representing a 70% oversupply. However, if the figures provided by the AHDB report²¹ are correct then the oversupply could be as high as 100 million animals or about 250% of the amount that is required.



²¹ Ethnic, T. The Halal Meat Market - Supply chain structures and consumer purchase. https://www.slideshare.net/alsaraf1/t-h-e-h-a-l-a-l-m-e-a-t-m-a-r-k-e-t

²² DEMAND FOR HALAL MEAT. https://projectblue.blob.core.windows.net/media/Default/Consumer%20and%20Retail%20Insight%20Images/CI_DemandForHalal3668_200601_WEB.pdf (2020).

²³ Downing, E. *Religious Slaughter of Animals*. https://researchbriefings.files.parliament.uk/documents/SN07108/SN07108.pdf (2015).

While these statistics amply demonstrate the huge overuse of non-stun slaughter methods, there are also specific examples that highlight the problem on a local scale. For example, a council in West Yorkshire has a blanket policy to serve non-stunned halal meat in its schools², likely due to the relatively large Muslim population in the region (14.5%)²⁴. This means that a large proportion of the non-stunned meat provided to these schools is consumed by people who have no requirement for non-stunned meat. There have also been concerns raised by consumers about the lack of labelling of halal meat. This results in shoppers unwittingly buying meat from non-stunned animals when they would otherwise consume stunned animals.²⁵

The Regulation of Non-Stun Slaughter in Other Countries

We can look to other countries for examples of more stringent regulation, or in some cases of an outright ban, of non-stun slaughter. In Europe, many countries have a full ban on non-stun slaughter, including Denmark, the Netherlands, Sweden, Malta, Switzerland, Cyprus, Norway, Estonia and Slovenia.^{2,26} In New Zealand, there is a ban on non-stun slaughter but the country still maintains a successful meat export trade to Muslim countries, including Saudi Arabia and Indonesia.² The best example of a successful restriction, rather than ban of non-stun slaughter, is in Germany. Here, abattoirs must apply for a licence to perform non-stun slaughter for religious exemptions. The licence is only granted to abattoirs if they can show that they have local religious customers for the request.²⁷ In addition, Germany has banned the export of non-stun meat.^{2,28}

The precedent set by other countries shows that stringent regulation of non-stun slaughter is possible. The licencing in Germany demonstrates that it is possible to restrict the production of non-stun meat to only meet the requirements of the national population of Muslims and Jews. The exemption in UK law allows for non-stun killing 'by the Jewish method (Shechita) for the food of Jews...' or 'by the Muslim method (Halal) for the food of Muslims...'.¹ As such, we believe that the spirit of the law intends for shechita and halal slaughter to be used only to fulfill the needs of the UK's Jewish and Muslim population. Any additional production of non-stun meat, either for the general domestic market or for export to other countries, should be ended.

²⁸ Case, P. Vets seek clarity on welfare in Saudi lamb deal - Farmers Weekly. https://www.fwi.co.uk/business/markets-and-trends/meat-prices/vets-seek-clarity-on-welfare-in-saudi-lamb-deal (2018).



²⁴ Kirklees Factsheets. https://www.kirklees.gov.uk/beta/information-and-data/pdf/kirklees-factsheets.pdf (2019).

²⁵ Dalton, J. Shoppers unknowingly buying no-stun religious meat in supermarkets. *The Independent* (2019).

²⁶ Wills, J. The Legal Regulation of Non-stun Slaughter: Balancing Religious Freedom, Non-discrimination and Animal Welfare. *Liverp. Law Rev.* **41**, 145–171 (2020).

²⁷ Eurogroup For Animals. *Slaughter without stunning briefing.* https://www.eurogroupforanimals.org/sites/eurogroup/files/2020-03/Slaughter-without-stunning_briefing.pdf (2018).

Conclusion

If the exemption on the stunning of animals in religious slaughter is to remain in place, it is imperative that the number of animals exposed to nun-stun slaughter is reduced to the minimum quantity needed to provide for the UK's Muslim and Jewish communities. Existing figures show that there is a large oversupply of at least 60% of non-stunned meat, representing about 42 million animals, even if conservative assumptions are made. If more reasonable assumptions are made then the oversupply is likely closer to a 70-150% oversupply. In this case, between 56 and 100 million animals unnecessarily experience non-stunned slaughter each year. We urge the UK government to set more stringent requirements for the use of non-stun slaughter so that these methods are only used to fill the direct requirements of religious communities. If such a policy were put in place, many millions of animals would be spared the unnecessary pain and distress of slaughter without prior stunning.



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