

## SLAUGHTER WITHOUT STUNNING

Eurogroup for Animals' calls for an EU ban of ritual slaughter carried out without prior stunning. No derogation should be in place for slaughter according to these rites. Resources should be urgently allocated to validating humane reversible stunning methods for all relevant species.

Eurogroup for Animals urges to implement specific processes and procedures to spare animals from any avoidable pain and discomfort prior and during slaughter. At this end a veterinary of the state veterinary service must always be present at the moment and at the place where animals are slaughtered.

### Background

According to Council Regulation 1/2009 on the protection of animals at the time of killing<sup>1</sup>, animals shall be killed only after being stunned, with derogation to this rule for 'animals subject to particular methods of slaughter prescribed by religious rites'<sup>2</sup>. However, the European Union leaves to Member States the possibility to not allow this derogation<sup>3</sup>, making stunning compulsory also for the production of halal<sup>4</sup> and kosher<sup>5</sup> meat.

The European Food Safety Authority (EFSA) concluded that serious welfare problems are highly likely to occur after the throat cut, since the animal can feel anxiety, pain, distress and other sufferings<sup>6</sup>. In the framework of the Dialrel project, an EU funded initiative to encourage dialogue on issues of religious slaughter<sup>7</sup>, the report on "Good and adverse practices" stated that with the utmost probability animals feel pain during the throat cut without prior stunning. In 2011 on the occasion of the Symposium on "Recent advances in the welfare of livestock at slaughter" it was clearly demonstrated that the act of slaughter by ventral neck incision is associated with noxious stimulation, which makes the death process

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<sup>1</sup> Council Regulation (EC) 1099/2009 of 24 September 2009 on the protection of animals at the time of killing.

<sup>2</sup> Art 4.4 of Council Regulation (EC) 1099/2009.

<sup>3</sup> Art 26.2 (c) of Council Regulation (EC) 1099/2009.

<sup>4</sup> "Halal" is the denomination used for the meat coming from animals slaughtered in line with Muslim community religious rite. This method of slaughtering animals consists of using a well-sharpened knife to make a swift, deep incision that cuts the front of the throat, the carotid artery, trachea, and jugular veins. The slaughter can be performed by a Muslim or an adherent of other religions. Blood must be drained from the veins.

<sup>5</sup> "Kosher" is the denomination used for the meat coming from animals slaughtered in line with Jewish community religious rite. The slaughter process is the same of Halal meat production, but kosher only allows one kind of Rabbi, called the Sachet, to slaughter animals. The Sachet is specially trained for slaughtering animals.

<sup>6</sup> EFSA, 2004. 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. <https://www.efsa.europa.eu/en/efsajournal/pub/45>

<sup>7</sup> Dialrel Project, Report on good and adverse practices - Animal welfare concerns in relation to slaughter practices from the viewpoint of veterinary sciences, K. von Holleben, M. von Wenzlawowicz, N. Gregory, H. Anil, A. Velarde, P. Rodriguez, B. Cenci Goga, B. Catanese, B. Lambooi.

painful for the animals undergoing this practice<sup>8</sup>. Additionally, there is disagreement within the scientific community on the time taken for animals to lose consciousness after the throat cut. According to recent studies, loss of consciousness in cattle can take up to 4 minutes<sup>9</sup>, thus exposing animals to a severe and prolonged period of suffering as well as posing the risk of the animals undergoing further processing procedures while still fully conscious.

Parts of the religious communities involved accept stunning or reversible stunning. Indeed, reversible electrical stunning is to all effects by many religious groups accepted as compatible with slaughter according to religious practices. For instance, the Food Standards Agency (FSA) animal welfare survey undertaken in abattoirs across Great Britain during one week in September 2013 showed that about 84% of animals slaughtered to produce halal meat were stunned before slaughter.

## State of play in Europe

EU Member States have interpreted Art 4.4 in different ways (Annex I). In 2010, the European Commission requested from Member States official data regarding numbers of animals religiously slaughtered without stunning within their territory<sup>10</sup>. The results show that, unfortunately, most Member States did not have reliable figures available. Five years later the Commission launched another quantitative survey to obtain a more complete picture of how the derogation on slaughter without stunning was being applied. Disappointingly, the survey has never been finalised due to difficulties in identifying a sufficiently reliable methodology to collect and complete the data.

Unofficial figures show that currently non-stunned meat is increasingly being produced for trade reasons. This practice is of course invalidating the efforts of certain Member States that, concerned about the welfare implication of

The lack of official figures shows that in most Member States there is no traceability or control on the use of the derogation laid down in Art 4.4 of Council Regulation 1/2009. Additionally, some countries are using the derogation to stun for trade purposes, thus ignoring its original aim (to respect human rights) and converting it into a commercial opportunity.

<sup>8</sup> Pain perception at Slaughter, CB Johnson, TJ Gibson, KJ Stafford and DJ Mellor, presentation given on 1st July 2011 at Centenary International Symposium of Humane Slaughter Association.

<sup>9</sup> EFSA concluded that it is up to 120 seconds in cattle and 20 seconds in sheep (see footnote 6), but a more recent study (Complications during Halal slaughter and Schechita in cattle, NG Gregory, M von Wenzlawowicz, K von Holleben, HR Fielding, TJ Gibson, L Mirabito, and R Kolesar; presentation given on 1st July 2011 at Centenary International Symposium of Humane Slaughter Association) showed that 8% of cattle took 60 seconds or more to lose consciousness, and that for 1.5% of cattle it took more than 4 minutes.

<sup>10</sup>

[http://www.europarl.europa.eu/RegData/bibliotheque/briefing/2012/120375/LDM\\_BRI\(2012\)120375\\_RE V2\\_EN.pdf](http://www.europarl.europa.eu/RegData/bibliotheque/briefing/2012/120375/LDM_BRI(2012)120375_RE V2_EN.pdf)

slaughtering animals without stunning, have decided to ban this practice or to strictly limit it to satisfy the needs of the local religious communities.

## **Eurogroup for Animals' position**

- Eurogroup for Animals believes that all animals should be stunned before slaughter. No derogation should be in place either for slaughter according to religious rites or for any other kinds of slaughter (e.g. domestic slaughter);
- Eurogroup for Animals believes that resources should be urgently allocated to validating humane reversible stunning methods for all relevant species. In the meantime, as a transitional measure, whenever pre-cut stunning is still not carried out during religious slaughter and until the reversible stunning techniques are validated for all species, the basic requirement of immediate post-cut stunning must be applied in order to protect the animals from additional unnecessary suffering;
- Eurogroup for Animals believes that slaughterhouse operators should also comply with the following conditions:
  1. Bovine animals should be killed in an upright position and should not be inverted or placed in a horizontal position prior to killing;
  2. No further processing, e.g. dressing procedures or electrical stimulation, must be performed on the animals before the bleeding has ended and the animal is dead;
  3. Operators must put in place and implement appropriate monitoring procedures to verify and confirm that both carotid arteries (or the vessels from which they arise) are severed, and that animals do not exhibit signs of life before further processing of the carcasses. An appropriate time-frame should be guaranteed to ensure that all the operations are carried out properly;
  4. A veterinary of the state veterinary service must always be present at the moment and at the place where animals are slaughtered.

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## **Annex I** Overview of the interpretation and application by certain EU Member States of the derogation laid down in Art 4.4 of Council Regulation 1/2005

In **Sweden, Norway, Switzerland, Iceland, Slovenia,** and **Denmark** stunning is always compulsory before slaughter, also for religious slaughter. In **Austria, Estonia, Latvia,** and **Slovakia** stunning is required immediately after the incision if the animal has not been stunned before.

Additional information:

- In **Sweden** all domestic animals must be stunned before slaughter. Religious slaughter without stunning has been prohibited since 1937<sup>11</sup>. Halal slaughter of stunned (prior stunning) animals takes place in Sweden.
- In December 2014, the **Polish** Constitutional Court overturned the ban on kosher and halal slaughter since the protection of animals "does not take priority over constitutional guarantees of religious freedom," with Judge Maria Gintowt-Jankowicz stating in her final verdict that "the constitution guarantees the freedom of religion which includes the carrying out of all activities, practices, rites and rituals which have a religious character".
- In 2014 the **Lithuanian** Parliament has passed a bill that legalizes slaughter without stunning for halal and kosher meat. The new law was designed to stimulate export of Lithuanian non-stunned meat to Israel and Middle East to compensate the ban imposed on import of Lithuanian meat by Russia.
- In 2016 the **Dutch Ministry of Agriculture** announced the plan to ban the export of kosher and halal meat in an effort to reduce the number of animals killed through non-stunned slaughter. The ministerial plan foresees to limit the production of meat coming from un-stunned animals to the satisfaction of the local Jewish and Muslim religious communities. Additionally, whenever animals are killed without prior stunning, a vet of the state veterinary service must be present. If an animal that is killed without prior stunning hasn't lost consciousness within 40 seconds the animal has to be stunned. To increase market transparency the Dutch Government is considering introducing a clear separation between the meat coming from non-stunned animals and the one coming from stunned animals. Currently the Government is evaluating how to legally arrange these.
- In **Belgium** in 2017 the government of Wallonia ban the slaughter without stunning within its region (the ban will come into force on 1st September 2019). The same will happen in Flanders as from 1st January 2019.
- In **Germany** the national authority gives to abattoirs the permission to slaughter animals without stunning only if they show they have local religious customers for the request<sup>12</sup>. To obtain this permission, applicants need to fulfil

<sup>11</sup> Animal Welfare Ordinance (1988:539), 30 §

<sup>12</sup> Tierschutzgesetz §4a [https://www.gesetze-im-internet.de/tierschg/\\_4a.html](https://www.gesetze-im-internet.de/tierschg/_4a.html)

many requirements: requirements on the slaughterhouse, requirements on the slaughter-procedure, data about species and number of animals.

- In **Finland** animals must be stunned before bleeding. This means that animals have to be unconscious when they enter the bleeding stage that kills them. The Finnish legislation does not allow traditional halal or kosher slaughtering. However, the legislation does permit religious slaughter procedures where the bleeding is started simultaneously with the stunning. In the new animal welfare law proposal, which it will be voted in Parliament in 2018, slaughter without stunning would be forbidden.