

1 May 2014

BVA RESPONSE TO BEEF AND LAMB ALL-PARTY PARLIAMENTARY GROUP'S CALL FOR EVIDENCE ABOUT MEAT SLAUGHTERED IN ACCORDANCE WITH RELIGIOUS RITES

Introduction and background

1. The British Veterinary Association (BVA) has been calling for an end to non-stun slaughter for a number of years, therefore we welcome the opportunity to provide evidence to Beef and Lamb All-Party Parliamentary Group regarding meat slaughtered in accordance with religious rites.
2. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 14,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns. This response has prepared with particular involvement from the BVA's Ethics and Welfare Group.

BVA comments

Is there a difference in the pain experienced by an animal killed without stunning versus one killed with stunning?

3. The BVA's view is that all animals should be stunned before slaughter. Scientific evidence demonstrates that slaughter without pre-stunning compromises animal welfare and causes unnecessary suffering. The BVA's concern is for the welfare of those animals that are not stunned. Our concerns have nothing to do with challenging the expression of religious beliefs but with the practice of killing by throat-cutting without pre-stunning.
4. There is a delay in time to loss of consciousness – therefore the pain experienced - and some studies on cattle have shown that delays can vary from a mean of 20 seconds to up to two minutes. Most sheep and goats seem to lose consciousness within 2-20 seconds. Poultry after 12-15 seconds but signs of consciousness are possible 26 seconds after the cut. With reference to throat cutting without stunning, the Farm Animal Welfare Council (2003) concluded:
'We are persuaded that such a massive injury [the throat cut] would result in very significant pain and distress in the period before insensibility supervenes'.
5. The EU-funded [Dialrel project](#) (2006-2010), which involved partners from 11 countries between 2006 and 2010, reported similar findings to the FAWC report referred to above. The Dialrel report (von Holleben and others 2010) considered more than 200 references and found (p56): *'It can be stated with high probability that animals feel pain during and after the throat cut without prior stunning. This applies even to a good cut performed by a skilled operator, because substantial tissue damage is inflicted to*

BVA CONSULTATION RESPONSE MAY 2014

areas well supplied with nociceptors and subsequent perception of pain is not exclusively related to the quality of the cut.'

6. The report also recognised (p60) that *'neck cutting without stunning poses the highest risk for the cut and during bleeding imposes extra manipulation to the animal. Additionally pain, suffering and distress during the cut and bleeding are highly likely'*.

What scientific evidence is available to support the position that one method is more humane than another method?

7. There are various pieces of scientific evidence available to back up our argument that non-stun slaughter causes significant animal welfare issues. These include:
- Gibson, T.J., Johnson C.B., Murrell, J.C., Hulls, C.M., Mitchinson S.L., Stafford K.J., Johnstone, A.C., and Mellor D.J. (2009). Electroencephalographic responses of halothane-anaesthetised calves to slaughter by ventral-neck incision without prior stunning. *New Zealand Veterinary Journal*. 57, 77-83. [Pubmed ID 19471325](#).
 - Gibson, T.J., Johnson, C.B., Murrell, J.C., Stafford, K.J., Chambers, P.J., and Mellor, D.J. (2009). Components of electroencephalographic responses to slaughter in halothane-anaesthetised calves: Effects of cutting neck tissues compared with major blood vessels. *New Zealand Veterinary Journal*. 57, 84-89. [Pubmed ID 19471326](#).
 - Gibson, T.J., Johnson, C.B., Murrell, J.C., Mitchinson, S.L., Stafford, K.J., and Mellor, D.J. (2009). Electroencephalographic response to concussive non-penetrating captive-bolt stunning in halothane-anaesthetised calves. *New Zealand Veterinary Journal*. 57, 90-95. [Pubmed ID 19471327](#).
 - Gibson, T.J., Johnson, C.B., Murrell, J.C., Mitchinson, S.L., Stafford, K.J., and Mellor, D.J. (2009).
 - Amelioration of electroencephalographic responses to slaughter by non-penetrative captive-bolt stunning after ventral neck incision in halothane-anaesthetised calves. *New Zealand Veterinary Journal*. 57, 96-101. [Pubmed ID 19471328](#).
 - Mellor, D.J., Gibson, T.J., and Johnson, C.B. (2009) A re-evaluation of the need to stun calves prior to slaughter by ventral-neck incision: An introductory review. *New Zealand Veterinary Journal*. 57, 74-76. [Pubmed ID 19471324](#).
 - Johnson, C.B., Murrell, J., Gibson, T.J., and Mellor, D.J. (2008). Innovative refinements to anaesthesia techniques can deliver pain research without pain. *Proceedings of the 6th World Congress on Alternatives & Animal Use in the Life Sciences August 21-25, 2007, Tokyo, Japan. AATEX 14, Special Issue, 97-100.*
 - Gregory, N.G., Fielding, H.R., von Wenzlawowicz, M. and von Holleben, K. 2010. Time to collapse following slaughter without stunning in cattle. *Meat Science* 85, 66-69.
 - Gregory, N.G., Schuster, P., Mirabito, L., Kolesar, R. and McManus, T. 2012. Arrested blood flow during false aneurysm formation in the carotid arteries of cattle slaughtered with and without stunning. *Meat Science* 90, 368-372.
 - Gregory, N.G., von Wenzlawowicz, M. and von Holleben, K. 2009. Blood in the respiratory tract during slaughter with and without stunning in cattle. *Meat Science* 82, 13-16.
 - EFSA: 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 [15 June 2004]
<http://www.efsa.europa.eu/en/efsajournal/doc/45.pdf>

BVA CONSULTATION RESPONSE MAY 2014

- FAWC Report on the Welfare of Farmed Animals at Slaughter or Killing 2003
- Report on good and adverse practices (EU Dialrel Project) - Animal welfare concerns in relation to slaughter practices from the viewpoint of veterinary sciences K.von Holleben et al <http://www.dialrel.eu/images/veterinary-concerns.pdf> (pages 53-60)

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?

8. 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.
9. In the absence of a proposal to require all animals to be stunned prior to slaughter, BVA believes that in principle some form of statutory legal requirement for immediate post-cut stunning should be introduced for all species by UK governments under the European derogation, for the sake of improved welfare conditions.
10. It is acknowledged that the time to loss of brain function in sheep (often within 10 seconds) is significantly shorter than for cattle (often after a minute or more)¹. Meaning bovines tend to benefit more than other species from post cut stunning. Therefore it is important that suitable procedures and equipment are put in place for other species (as well as bovines), to ensure post cut stunning is carried out effectively and quickly.
11. If such a requirement is adopted then it will be necessary to establish a clear definition of what constitutes 'immediate' in terms of the timing and effectiveness of the delivery of a post-cut stun and the type of restraint used.
12. Research has been carried out (by Craig Johnson and K.von Holleben et al – see references above) which BVA currently considers demonstrates the welfare benefits of post-cut stunning and it should not be necessary now to kill animals as a consequence of further research into this practice.

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?

13. If slaughter without stunning is still to be permitted then any meat or fish from this source must be clearly labelled. This will enable consumers to fully understand the choice they are making when purchasing such products.
14. The BVA is calling for 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

BVA CONSULTATION RESPONSE MAY 2014

labelling system is confusing for consumers. Country of origin labelling should include information on where the animal was born/hatched, reared and slaughtered.

15. Consumers should be educated and informed about animal welfare at slaughter and given confidence when buying meat or meat products through reliable explanatory information about food labels or logos of assurance schemes that require stunning before slaughter. The introduction of a simple logo for packaging to indicate meat obtained from non-stunned animals could also be an option.
16. We note the concerns raised by the FVO in 2011 which found that a significant amount of meat produced using the legal exemption was actually not sold as Halal and currently there are no real controls in place to ensure the meat is consumed by the intended market. Ideally, the number of animals slaughtered without pre-stunning should be in line with the market for the meat produced. This would help to ensure compliance with the requirement that the use of meat from non-stunned animals is restricted to those communities that require it for their religious beliefs, therefore keeping non-stunning to a minimum.
17. If slaughter without stunning is still to be permitted then the establishment of a clear statutory traceability process (perhaps incorporating a specific meat stamp) to enable the labelling of non-stun meat would help to target the meat at the appropriate religious communities.

Are there examples of best practice that the UK can learn from overseas?

18. We note that in Germany, religious slaughter without previous stunning is only allowed for religious communities whose rules require slaughter without stunning or prohibit consumption of meat of animals not slaughtered in this way. The religious community or butcher concerned has to make an application to the competent authority, citing the number of animals to be slaughtered, the indication of the religious community on whose behalf the slaughter is carried out, as well as the way this is performed. The competent authority verifies whether such rules are compulsory, and whether the number of animals to be slaughtered is not bigger than it is actually needed to satisfy the needs of the concerned religious community, then grants a licence.
19. We also note from the examples of Sweden and Denmark, that it is possible to implement a legal requirement for all animals to be stunned before slaughter. This provision also been made law in non EU countries such as Norway, Iceland and Switzerland.