

Pre-stunning of animals at slaughter in the UK: **Government inaction**

A report on the issue as of August 2009, by Gavin Orland (gavin_orland@hotmail.com)

For the particular attention of:

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Member for Tooting

And for the attention of:

Hilary Benn MP
Secretary of State for Environment, Food & Rural Affairs

Nigel Farage MEP
Leader, United Kingdom Independence Party

Nick Herbert MP
Shadow Secretary of State for Environment, Food & Rural Affairs

Professor Christopher Wathes
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Part 1: The law regarding pre-stunning

At present, all animals slaughtered in the United Kingdom must be pre-stunned (rendered unconscious by a bolt or electrical charge) - except those being ritually slaughtered for consumption by Jews ("kosher" or "shechita" meat) or by Muslims ("halal" meat). This ruling is to ensure that animals are unconscious while slaughtered, thereby minimising their pain, and it has been made by a number of successive legal statutes:

1. Slaughter of Animals (Scotland) Act 1928

It was first determined by a law of 1928, The Slaughter of Animals (Scotland) Act, as noted by the Farming & Animal Welfare Council in one of their reports to the government:

"The requirement for pre-slaughter stunning of horses, cattle, sheep and goats was first introduced in national legislation by the Slaughter of Animals (Scotland) Act 1928."¹

It adds:

"The act contained exemptions for both Jewish and Muslim slaughter ... Both exemptions contained the proviso that no unnecessary suffering should be inflicted."²

2. Slaughter of Animals Act 1933

In this act the same rulings were applied to England and Wales.

3. Slaughterhouses Act 1974

The ruling was also made in the Slaughterhouses Act of 1974, which again stated the necessity of pre-stunning (section 2:36), but again allowed exemption for religious groups - with the proviso that the slaughter be carried out "without the infliction of unnecessary suffering". This act was deregulated in 1996.

4. Slaughter of Animals (Scotland) Act 1980

The 1928 act was repealed in its entirety in 1980, when the Slaughter of Animals (Scotland) Act 1980 was passed. This again made the same ruling.

¹ (FAWC, 1985) Part 1:14

² Ibid.

5. Welfare of Animals (Slaughter or Killing) Regulations 1995 (No. 731)

These regulations, known as "WASK", define the current law on the issue of pre-stunning and ritual slaughter in the United Kingdom. The relevant sections of the Slaughter of Animals (Scotland) Act 1980 (10 & 11) were repealed by these regulations, as were numerous sections of other acts.

The most relevant parts of these regulations are as follows:

"No person engaged in the movement, lairaging, restraint, stunning, slaughter or killing of animals shall—

- a) cause any avoidable excitement, pain or suffering to any animal; or
- b) permit any animal to sustain any avoidable excitement, pain or suffering."³

"Where any soliped, ruminant, pig, rabbit or bird is brought into a slaughterhouse or knacker's yard for slaughter, that animal shall be—

- ...
- c) subject to regulation 22, stunned before slaughter in accordance with Parts I and II of Schedule 5; and
- d) bled or pithed in accordance with Schedule 6."⁴

"Schedule 5 (which relates to the stunning and killing of animals) shall not apply to any animal which is slaughtered in accordance with Schedule 12 (which relates to slaughter by a religious method)."⁵

The schedule 12 mentioned ("Additional provisions for slaughter by a religious method") contains various rulings intended to minimise animal suffering (for example, ensuring that the knife used during ritual slaughter is sharp).

This report will show that in the light of further moral and scientific progress, WASK section 5:22, set out in the regulations of 1995, can be clearly seen to conflict with section 1:4 of those same regulations, and that as a matter of urgency the law should be amended so that section 5:22 is repealed.

³ (WASK) Part 1:4 (1)

⁴ Ibid. Part 3:14

⁵ Ibid. Part 5:22

Part 2: Ritual animal slaughter in the UK

The Government keeps no statistics on the number of animals slaughtered under religious methods in the UK, but a Meat Hygiene Service report of 2004 suggests that 114 million halal animals and 2.1 million kosher animals are killed each year.⁶

1. Religious instructions to slaughter without pre-stunning

In order to attempt to justify their exemption, Jews generally point to a verse in the Old Testament which says:

"If the place which the LORD thy God hath chosen to put his name there be too far from thee, then thou shalt kill of thy herd and of thy flock, which the LORD hath given thee, as I have commanded thee, and thou shalt eat in thy gates whatsoever thy soul lusteth after."⁷

Muslims tend to point to a passage in the Qur'an which says:

"Forbidden unto you (for food) are carrion and blood and swineflesh, and that which hath been dedicated unto any other than Allah, and the strangled, and the dead through beating, and the dead through falling from a height, and that which hath been killed by (the goring of) horns, and the devoured of wild beasts, saving that which ye make lawful (by the death-stroke), and that which hath been immolated unto idols."⁸

Neither the Old Testament nor the Qur'an offer any reasoning to support their instructions, but this is invariably the case in religious texts. More interestingly, neither explicitly forbid pre-stunning either.

2. Concern about slaughter without pre-stunning

In line with increased i) concern for animal welfare and ii) scientific understanding since 1928, many individuals and organisations have become increasingly concerned about the exemptions made under law allowing the slaughter of animals without pre-stunning.

The FAWC and its reports

The Farming Animal Welfare Council is an independent advisory body established by the government in 1979. Its terms of reference are to keep under review the welfare of farm

⁶ (Hickman, 2008)

⁷ (Bible) Deut. 12:21

⁸ (Pickthall, 1938) "The Food" 5:3

animals on agricultural land, at market, in transit and at the place of slaughter and advise Government of any changes that may be necessary.

The FAWC identifies five "freedoms" for animals, as follows:

1. Freedom from hunger and thirst
2. Freedom from discomfort
3. Freedom from pain, injury and disease
4. Freedom to express normal behaviour
5. Freedom from fear and distress

The FAWC is an independent and impartial body. It is not a vegetarian body like Viva!, which is against all slaughter, or a pro-Halal body such as the Halal Food Authority. The FAWC has no ulterior motive; its only concern is that animals be killed humanely and without any avoidable suffering. The organisation states words to the following effect in multiple reports:

"We have considered how best welfare can be protected once the decision has been made to kill an animal. Current legislation requires that the method of slaughter or killing itself must not cause any avoidable excitement, pain or suffering to any animal."⁹

Over the years, the FAWC has produced a number of reports which deal with the issue of ritual slaughter slaughter, the most relevant being these three:

1. Report on the Welfare of Livestock When Slaughtered by Religious Methods (1985)
2. Report on the Welfare of Farmed Animals at Slaughter or Killing - Part 1: Red Meat Animals (2003)
3. Report on the Welfare of Farmed Animals at Slaughter or Killing - Part 2: White Meat Animals (2009)

These reports are all freely available from the FAWC, with the latter two being downloadable from their website. They are all clearly written and the increased availability of, and reliance on, scientific evidence is interesting to note as the reports proceed.

In its 1985 report the FAWC is very concerned about numerous shortcomings apart from the lack of pre-stunning in religious slaughterhouses, as can be seen from these excerpts:

"In both Jewish and Muslim establishments we were very concerned at the rough way in which birds were removed from the crates. Also their handling in the bleeding room left much to be desired, with birds, which had their throats cut, frequently being thrown or even rammed into the bleeding cones where these were used."¹⁰

⁹ (FAWC, 2009) Part 1:14

¹⁰ (FAWC, 1985) Part 2:68

"There is ... a noticeable lack of direction and supervision of slaughter operations from within the Muslim community."¹¹

"We are very concerned about the practices used by some Muslim slaughtermen and the lack of training, expertise and supervision ... We have been informed that from a religious point of view, no formal training is required by Muslim authorities ... Any person of the faith irrespective of age, including children, can carry out slaughter."¹²

Some (but not all) of its concerns have now been addressed by WASK. In their 2003 Red Meats report the FAWC state:

"[We] feel that the outstanding welfare issues should be re-examined."¹³

In this report it also writes of matters such as:

1. The inadequacy of restraining pens at some slaughterhouses which do not use pre-stunning
2. Illegal handling practices where young sheep were lifted by the fleece
3. Slaughtermen inserting their hands into open wounds, thereby causing avoidable pain

It also wrote of other observed practices which delay the time to insensibility for an animal.

The government, in its official response, accepted some of FAWC's recommendations on these matters, but rejected others. For example it rejected issue (3), stating:

"Response: Do not accept. The Government is committed to respect for the rights of religious groups, and in view of the assertion by Shechita UK that the insertion of the slaughterman's hand into the wound to check that all the vital structures have been cut cleanly is an essential part of shechita slaughter, we will not be legislating against it.

We accept that such action will stimulate nociceptive pathways and in a conscious animal may lead to a perception of pain. However the length of time for an animal to lose consciousness after the neck cut is disputed. We will continue to explore with the religious authorities whether, following the cut, there could be a greater delay before this inspection is carried out."

In its 2009 report the FAWC raise other concerns to be considered by government, for example:

"Birds stunned electrically using pulsed D.C. can recover reliably and this method is used in some slaughterhouses for the production of Halal poultry meat."¹⁴

¹¹ Ibid. Part 2:79

¹² (FAWC, 1985) Part 2:79

¹³ (FAWC, 2003) Part 3:179

Part 3: The suffering caused by slaughter without pre-stunning

In its reports, the FAWC considers slaughter without pre-stunning in isolation of all the above malpractices. By law, this is supposed to be performed using a long, very sharp knife.¹⁵

The FAWC enters into considerable detail, especially in the later reports. It concludes in each report, with ever more certainty as the scientific evidence mounts, that these methods inevitably cause considerable and unnecessary suffering for animals. The 1985 report finds that calves might remain susceptible to pain for up to 297 seconds after the lethal incision was made, stating:

"Even the shorter times must be regarded as unacceptably long and if only one carotid artery is severed can be increased five-fold. It can be assumed that these scientific experiments were carried out under ideal controlled conditions. Our observations during visits to slaughterhouses have shown that following less expert slaughter, where the cuts have been less effectively carried out, animals have remained conscious for much longer periods than these."¹⁶

It adds:

"We believe that when animals are being slaughtered their welfare is paramount and loss of sensibility should be immediate. It is clear to us, from our study of currently available work and our own observations, that loss of consciousness following severance of the major blood vessels in the neck is not immediate. We have not been convinced by arguments that direct cutting of the throat when carried out speedily and efficiently causes the animal no more suffering than if it had been effectively stunned."¹⁷

In its 2003 report the FAWC directly observes slaughter without pre-stunning once again and benefits from the increased scientific research available. Having pointed out that it is impossible to measure an animal's level of pain with absolute certainty (not least because the animal's motion is greatly restricted)¹⁸, it finds as follows:

"When a very large transverse incision is made across the neck a number of vital tissues are transected including: skin, muscle, trachea, oesophagus, carotid arteries, jugular veins, major nerve trunks (e.g. vagus and phrenic nerves) plus numerous minor nerves. Such a drastic cut 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."¹⁹

In this same report, the FAWC concludes that a calf can take up to 120 seconds to become insensible having had its throat slit without pre-stunning.²⁰

¹⁴ (FAWC 2009) Part 3:137

¹⁵ (WASK) Schedule 12, Part 2, 6a

¹⁶ (FAWC, 1985) Part 2:75

¹⁷ Ibid. Part 2:76

¹⁸ (FAWC, 2003) Part 3:194

¹⁹ (FAWC, 2003) Part 3:195

In its latest report (*White Meat Animals*, 2009), the FAWC becomes even more confident of its position, benefitting from yet more scientific evidence. In the introduction to this report Prof Christopher Wathes states:

"The Council's advice to the Government is based on a wealth of scientific knowledge and practical experience, not only of its members but also of many within the poultry and its allied industries, scientists, veterinarians and others concerned about poultry welfare. I have no doubt at all that implementation of this Report's recommendations will lead to significant improvements in the welfare of poultry at slaughter or killing."²¹

One of the "principles of humane slaughter" identified by this report is:

"Prior to slaughter or killing an animal, either it must be rendered unconscious and insensible to pain instantaneously or unconsciousness must be induced without pain or distress"²²

The findings of this latest report are the most categorical and clearest of all:

"On the basis of the available evidence, veterinarians, scientists, and enforcement and animal protection groups worldwide consider that animals should be stunned before slaughter."²³

"The time to loss of consciousness is a critical measurement since this is the period in which birds may experience pain and distress. One study measured the time to brain death in broilers, indicated by the EEG and somatosensory evoked potentials. Brain death was reached in 2 minutes when both carotid arteries were cut and up to 4 minutes if only one artery was cut. These birds were anaesthetised and respirated artificially. More recent research undertaken in Australia has used various indicators of the time to loss of consciousness; i.e. loss of eye response (by 15 s), loss of posture (8-26 s), onset of muscular contractions (5-23 s) and time to loss of 60% of free blood (21-45 s). Further research, including measurement of the ECG and EEG, is required to confirm conclusively the time to loss of consciousness when poultry are slaughtered without pre-stunning. The evidence gathered so far indicates that many birds are likely to be conscious for 20 s or more after the neck cut is made."²⁴

"When a transverse incision is made across the neck of a bird, a number of sensitive tissue are transected including skin, muscle, trachea, oesophagus, carotid arteries, jugular veins, major nerve trunks and numerous minor nerves. Such a large cut will inevitably trigger sensory input to pain centres in the brain. Our conclusions from the evidence reviewed are that such an injury would result in significant pain and distress in the period before insensibility supervenes.

Little behavioural reaction was seen when the neck of poultry was cut without stunning. Manual restraint may partly explain this. Manipulation of the neck cut cannot avoid stimulating nerves and would therefore be painful. Rubbing on the surface of the cone used to restrain birds during bleed out would also cause a noxious nociceptive stimulus in a conscious bird."²⁵

²⁰ Ibid. Part 3:198

²¹ (FAWC, 2009) Introduction

²² Ibid. Part 1:15

²³ Ibid. Part 3:200

²⁴ Ibid. Part 3:203

²⁵ (FAWC, 2009) Part 3:205-206

Part 4: Key FAWC recommendations

1. Application of the law

In the 1985 report the FAWC concluded that some Muslim slaughterhouses were under the impression that they were exempt from all of the quality controls, not merely the stunning requirement. The FAWC also found that meat from animals slaughtered under halal methods was being illegally sold on to alternative markets (an issue to which this report will return later). It recommended the law be enforced in these respects.

2. The need for pre-stunning

Specifically regarding the pre-stunning exemption granted for ritual slaughter, the FAWC reported in 1985:

"We have been convinced during the course of our enquiries that the slaughter of animals is most humane if they are effectively stunned before bleeding. The up-to-date scientific evidence available and our own observations leave no doubt in our minds that religious methods of slaughter, even when carried out under ideal conditions, must result in a degree of pain, suffering and distress which does not occur in the properly stunned animal ... We believe that our findings show conclusively that change is needed."²⁶

The FAWC recognised that religious people are often very resistant to scientific evidence when they feel it contradicts their religious beliefs. Suggesting the repealing of the 1985 exemption clause, it proposed a generous period of time for adjustment:

"We therefore recommend that Ministers should require Jewish and Muslim communities to review their methods of slaughter so as to develop alternatives which permit effective stunning. Their findings should be presented to Ministers so that the legislative provisions which permit slaughter without stunning of animals (including poultry) by Jews and Muslims can be repealed within the next three years."²⁷

The FAWC added:

"We believe that such a conclusion does not carry with it inherently anti-Jewish or anti-Muslim views, or restrict religious freedom."²⁸

This recommendation was rejected by the government.

²⁶ (FAWC, 1985) Part 3:92

²⁷ Ibid. Part 3:93

²⁸ Ibid. Part 3:77

The FAWC re-iterated its recommendation in 2003:

"Overall, we have looked at slaughter without pre-stunning against the basic principles set out at the beginning of our report which aim to ensure the welfare of animals at slaughter (see Paragraph 8). We consider that at least two of these principles – pre-slaughter handling facilities that minimise stress and induction to a period of unconsciousness without distress – are not satisfactorily observed. Given that the exemption from pre-stunning is subject to the requirement that unnecessary suffering is not inflicted, we consider that the Government should take steps to repeal this exemption."²⁹

This advice was again rejected by the government.

In its latest (2009) report, the FAWC recommend:

"Further studies, including measurement of the ECG and EEG, are required to confirm the length of time to loss of consciousness, during which pain and distress could be experienced, for birds slaughtered without pre-stunning."³⁰

But nonetheless state:

"FAWC is concerned about the pain and distress experienced by conscious birds, in particular that likely to be generated by a neck cut and, where practised, subsequent manipulation of the wound. Following consideration of the available evidence, FAWC is in agreement with the prevailing international scientific consensus that slaughter without pre-stunning causes pain and distress. On the basis that this is avoidable and in the interests of welfare, FAWC concludes that all birds should be pre-stunned before slaughter."³¹

While again recognising that religious people are often resistant to scientific evidence, the FAWC concludes, in this report:

"Slaughter of poultry without pre-stunning causes significant avoidable pain and distress. Government should engage with the appropriate communities to ensure that avoidable pain and distress is prevented."³²

In the 2009 report we see the same recommendation as in the previous reports, namely that "all birds should be pre-stunned before slaughter"³³, but a hitherto unseen political correctness is starting to creep into the terminology:

²⁹ (FAWC, 2003) Part 3:200

³⁰ (FAWC, 2009) Part 3:204

³¹ Ibid. Part 3:207

³² Ibid. Part 3:209

³³ (FAWC, 2009) Part 3:207

1. We do not directly see the word "repeal"
2. We see phrases such as "engage with the appropriate communities"

One can only wonder why this is, because the scientific findings are the same, if not more damning. Perhaps the FAWC, weary of its recommendations being rejected by government, is trying a softer approach. Meanwhile, animals are continuing to suffer unnecessarily.

3. Misc. recommendations:

Across the reports the FAWC make other recommendations specific to religious slaughterhouses, including:

1. The banning of Sikh Jhatka slaughter (decapitation of an animal without pre-stunning) within three years
2. The banning of rotary pens within two years
3. A legal obligation for humane treatment of birds (having witnessed mistreatment of birds at Muslim establishments in particular)
4. The mandatory licensing of all slaughter premises and slaughtermen (having visited unlicensed Muslim establishments)

Some, but not all, of these have been acted upon by government.

Part 5: Halal & kosher meat being sold to alternative markets without clear labelling

In its 1985 report the FAWC note that meat slaughtered by religious methods sometimes found its way to alternative markets, and recommend the clear labelling of such meat:

"We feel that consumers when purchasing meat should be aware of the method by which that meat was prepared in order that they may have the option of selecting meat which accords with their own views on slaughter methods. We therefore recommend that all carcasses and cuts prepared from animals (including poultry) slaughtered by religious methods and offered for sale down to, and including the retail level, should be clearly labelled to indicate the method of slaughter."³⁴

Twenty-four years later, nothing has been done to this effect.

In April 2008, the Food and Farming minister in the UK, Lord Rooker, said that Halal and Kosher meat should be labelled when it is put on sale, so that the public can decide whether or not they want to buy food from animals that have bled to death.

Lord Rooker stated:

"I object to the method of slaughter ... my choice as a customer is that I would want to buy meat that has been looked after and slaughtered in the most humane way possible."³⁵

Julia Wrathall, the head of the RSPCA's farm animal group, supported Lord Rooker's views, saying:

"We are delighted that Lord Rooker has raised this. We very much hope that the Government will now progress what it has claimed to do before, which is to work with religious groups and look at the area of labelling."³⁶

Nothing to this effect has so far happened.

In addition, reports are arising that schoolchildren are being given no choice but to eat halal meat³⁷ and that such meat is being served in hospitals with no government guidelines.³⁸

³⁴ (FAWC, 1985) Part 3:95 (n)

³⁵ (Hickman, 2008)

³⁶ Ibid.

³⁷ (Buckwell, 2006)

³⁸ (Hansard, 2009)

Part 6: Other voices calling for the FAWC's recommendations to be enforced

The FAWC is by no means alone in calling for a reform to the law regarding slaughter without pre-stunning: numerous high profile individuals and every animal welfare group in the United Kingdom share its position.

1. RSPCA

The RSPCA has made the following statements:

"The RSPCA is opposed to the slaughter of any food animal without rendering that animal insensible to pain and distress until death supervenes."³⁹

"The RSPCA recognises that in any democratic country it is a fundamental right of religious groups to practice their beliefs without hindrance, but where these beliefs are directly responsible for animal suffering, that right has to be challenged. Surely it is not unreasonable to suggest that, in the light of new scientific knowledge and society's more caring attitudes to animals, religious traditions might be changed to secure an animal's welfare before and during slaughter."⁴⁰

2. Viva!

Viva! is a vegetarian animal welfare organisation against all slaughter, but especially against religious slaughter, because of the unnecessary suffering it entails. Viva! states:

"The law states that animals must be stunned before they are killed in the abattoir but animals which are killed by Jewish and Moslem religious slaughter are exempt from that rule. Scientific evidence shows that these animals face severe pain and distress. The Government's own advisory body, the Farm Animal Welfare Council, called for the banning of religious slaughter. Viva! has opposed religious slaughter for many years.

Although stunning before slaughter is often ineffective, slaughter without it is an excruciating and terrifying experience faced by millions of animals every year. At present the law exempts animals killed to provide Jewish shechita and Moslem halal meat from the requirement to be stunned: Viva! believes that law must be repealed as a matter of urgency."⁴¹

Viva! estimates that 10 millions animals per year are ritually slaughtered in Britain.

It presents some very compelling arguments on the webpage cited as to why the current exemption should be repealed, and it condemns government inaction on the issue.

³⁹ (RSPCA, 2006) Para 7:10

⁴⁰ (RSPCA, 1995)

⁴¹ (Viva!)

3. Lord Rooker

Lord Rooker is a former Minister of State for Sustainable Food and Farming and Animal Health at DEFRA. Dealing first hand with these issues, he said:

"I've been in slaughterhouses. Religious slaughter techniques are something I don't subscribe to."⁴²

4. David Taylor MP

David Taylor MP (Labour) is notable for having stood up in Parliament on several occasions and voiced his concerns about the unnecessary cruelty of ritual slaughter and the lack of labelling guidelines. On May 21st 2009 he stated:

"[Ritual slaughter] cannot be allowed to continue and we must end those exemptions. It is cruel, unacceptable and antediluvian. We must make progress on this issue."⁴³

Many other figures and organisations have stated their opposition to ritual slaughter without pre-stunning, but ultimately the reports from the FAWC do not require any further qualification.

⁴² (Hickman, 2008)

⁴³ (Hansard, 2009)

Part 7: Conclusions

1. Inconsistent law

An improved awareness of animal welfare and availability of scientific data, as presented by the FAWC reports, has shown beyond any reasonable doubt that Part 5 Section 22 of WASK is inconsistent with Part 1 Section 4 of those same regulations.

In order for Part 1 Section 4 to be upheld, Part 5 Section 22 should be repealed as a matter of urgency.

2. Government inaction

Successive governments have been advised to repeal the exemption to pre-stunning on three separate occasions over a period of 24 years by appointed advisers, the FAWC.

Despite this claim being important for animal welfare and being made repeatedly, the government has failed to act. Lord Rooker's successor, Muslim MP Khalid Mahmood, notably failed to address the issue, as have subsequent ministers.

Responding to the FAWC's 2003 report, Animal Welfare Minister Ben Bradshaw MP stated:

"We will not ban the production of halal or kosher meat. A ban could in any case simply result in kosher and halal meat being imported. We would, therefore, be exporting the problem, resulting in no overall improvement in animal welfare."⁴⁴

But from a moral point of view it is arguable that anything that makes it more difficult to get such meat into the United Kingdom is a good thing. Indeed the government might consider banning the import of ritually slaughtered meat also, as a message that the country does not condone the practice. Mr Bradshaw was at pains in his speech to consider the sensitivities of religious groups – clearly over and above the welfare of the animals they seek to inhumanely slaughter.

DEFRA made the following statement in response to the FAWC's recommendation:

"Response: Do not accept. The Government does not intend to ban the slaughter of animals without prior stunning by religious groups.
We agree with FAWC that the scientific evidence indicates that animals that receive an effective pre-cut stun do not experience pain at the time of slaughter. The balance of current scientific evidence also suggests that those cattle which receive an immediate post-cut stun are likely to suffer less than those that do not. However we recognise that this latter conclusion is disputed. The Government is committed to respect for the rights of religious groups and accepts that an

⁴⁴ (DEFRA, 2004)

insistence on a pre-cut or immediate post-cut stun would not be compatible with the requirements of religious slaughter by Jewish and Muslim groups."⁴⁵

This will be seen by many as blatant appeasement.

Regarding labelling, Mr Bradshaw stated in April 2007:

"DEFRA has made no estimation of the proportion of meat prepared according to shechita that is sold without labelling to this effect. Compulsory labelling of meat would require action at the European level, and this is not an area where the Government expects to see changes in labelling law in the foreseeable future. However, there is nothing to stop such information being provided voluntarily."⁴⁶

He thereby indicated that the government did not even have any intention of arguing for mandatory labelling of halal and kosher food.

In its official response to this issue, the government stated:

"Others, particularly consumer and welfare groups, oppose slaughter without prior stunning and do not wish to eat meat that has not been stunned prior to slaughter. Meat from these animals can find its way onto the ordinary meat market but is not identifiable by consumers at the point of sale. As part of the wider process of review and consultation on labelling meat, the Government will work with consumer and industry groups to consider whether this problem can be addressed through a voluntary system of labelling, bearing in mind that an early EU agreement on meat labelling according to slaughter method is unlikely."⁴⁷

The government hardly seems alarmed about the issue. It gives every impression of action having to be dragged out of it. It could, instead, have announced an intention to argue for clear labelling to be made mandatory throughout the EU.

The government is now considering its response to the FAWC's latest report (White Meats, 2009). We can only hope it finally takes the required action on the outstanding issue of pre-stunning.

3. The consequences of government inaction

The rise of the far right

An abundance of newspaper articles, online forums and blogs (not to mention election results) testify that electorate are becoming acutely aware of what can only be described as a policy of widespread, wholesale, religious appeasement from the UK government - especially with

⁴⁵ (DEFRA) Rec. 201

⁴⁶ (HCSN SN/SC/1314)

⁴⁷ (DEFRA) Rec. 201

regard to the rapidly growing religion of Islam (a quasi-political ideology which is utterly intolerant of any dissent⁴⁸).

In many instances this appeasement is a cause for extreme concern among the general public. For example: when Dutch MP Geert Wilders was invited to - then banned from entering - Britain earlier this year, despite having no criminal record whatsoever, even the comments on the website of left-wing newspaper *The Guardian* overwhelmingly condemned the decision as misguided and possibly even illegal.⁴⁹

The government inaction on the issue of pre-stunning can only be explained as yet another example of this trend of appeasement, and it is a very urgent and glaring one.

There is no explanation other than government fear of violent Muslim and possibly Jewish reaction.

But a country cannot live in fear of a minority of its citizens while sacrificing its principles. Yes, there can be freedom of religion, but only inasmuch as it does not harm others, be it people or indeed animals. If the government does not stand up for this principle, the people will vote it out. The likely outcome is a strong shift to the right. We are seeing this trend reflected already in the racist BNP winning seats at the European elections and indeed in Labour's plummeting performance domestically.

So the first consequence of this appeasement, or even *perceived* appeasement, is that the government will be mistrusted, disrespected and ultimately voted out, opening the way for a far right wing party. Possibly, eventually, one that is too far right wing.

Continued, avoidable, animal suffering

The other most obvious consequence of government inaction, of course, is that thousands of animals per year will continue to suffer unnecessarily. They suffer the kind of deaths that the most depraved Islamic terrorists inflict upon human beings. As a civilised country the United Kingdom has a moral duty to put a stop to this and the government should be leading by example, not following. Were the government to finally act, this would make the electorate proud, for once.

⁴⁸ (SAQ, 2009)

⁴⁹ (Guardian, 2009)

4. What must be done

In the light of all the evidence presented in this report, the government should take the following action:

1. The exemption granted in WASK Section 5: 22 (also applying to Jhatka) must be repealed at the soonest opportunity on grounds of animal welfare.
2. Government should consider banning the import of ritually slaughtered meat on grounds of animal welfare.
3. In the interim, legislation should be passed making labelling of ritually slaughtered meat mandatory in all contexts (i.e. on the front of restaurants, on menus, in schools and on food packaging). Consumers have the right to know whether they are purchasing meat which has been ritually slaughtered.
If the labelling is found to be impossible in the short term because of EU restrictions, the UK government should seek to have those restrictions overthrown (indeed it might consider taking Britain out of the EU on this and other grounds).
4. In the interim before the banning of ritual slaughter in the UK, halal and kosher meat must never be the only option in schools or hospitals. Children and their parents must have the right to choose meat from animals slaughtered by more humane methods.
5. Government should implement not only the pre-stunning finding, but also all other recommendations of the FAWC reports unless it can offer very good reasons for not doing so. Good reasons do not include appeasement.
6. Government should keep accurate figures on the number of animals ritually slaughtered until the exemption is repealed.
7. Government should pro-actively prosecute any slaughterhouses found to be in breach of the law on animal welfare, and not simply let matters drift until the next FAWC report.

5. The consequences of government action

The likely consequences of this action include the following:

1. An enormous decrease in animal suffering
2. Muslim and Jewish anger – claims of victimisation. This possibly leading to protests and even rioting.
3. Significant rise in government popularity (indeed disbelief among electorate)
4. Raised levels of meat imports (unless this is outlawed)

However, religious protests may not be as bad as the government might fear. While the Qur'an is very clear in some places (for example with regard to how unbelievers should be treated), as established in section 2:1 of this report it is not clear at all with regard to whether pre-stunning must be outlawed. Consequently, as the FAWC note:

"Some Muslims find stunning acceptable and believe that it does not contravene Muslim teaching."⁵⁰

In both Denmark and New Zealand pre-stunning is already a legal requirement for Halal slaughter, with the consent of the Muslim population. Indeed most halal meat in the UK is thought to already be from pre-stunned animals. The FAWC state:

"Pre-slaughter stunning methods for sheep and cattle stunning methods for sheep and cattle that have been demonstrated not to kill the animal, such that the heart is still beating, have been deemed acceptable and have routinely been adopted in many Halal slaughterhouses."⁵¹

This is not the case in all slaughterhouses – but it could be.

In the case of Judaism, while there is generally a greater insistence on animals having their throats slit without being pre-stunned, the supposed grounds for this in their religious books are even more vague. So again there is some scope for reasoning with them. In any case, "Where reason fails to open the mind, compassion may open the heart".

Either way (whether the religious groups accept the rulings readily or not) the civilised and rational people of a country must not be held to ransom, threatened, by the uncivilised - by those who wish to slaughter animals causing them extreme and unnecessary pain for their own religious satisfaction. Ample evidence can be presented that the exemption should be repealed, and if people choose to riot nonetheless, we have riot police - and even the army if required.

6. Final conclusion

The government has expressed its commitment to ensuring religious freedoms, but these freedoms must be restricted when they are demonstrably at odds with civilised behaviour.

The government has become carried away with its defence of religious liberties to the point that it permits animal suffering on a massive scale and opens the way for extreme right-wing parties to gain a foothold in the country.

The government does not have to take this path and it is important that it does not take this path. It is likely to win far more admirers than detractors if it insists upon civilised behaviour within the country.

If the government wants to stand even a remote chance of re-election, it is vital that it begins to show some backbone on issues such as this. A government and its rational, humane citizens, cannot and must not be held under threat of violence by an unreasonable, irrational and inhumane minority, as is currently the case. Therefore I, and many others, strongly request immediate - not deferred - action on the issue of pre-stunning for all animals slaughtered within the United Kingdom.

⁵⁰ (FAWC, 1985) Part 1:50

⁵¹ (FAWC, 2003) Part 3:184

References

Bible. *Old Testament*. King James Edition.

Buckwell, A. (2006). Parents angered as every pupil is given halal school meals. *Daily Mail*, <http://www.dailymail.co.uk/news/article-423111/Parents-angered-pupil-given-halal-school-meals.html>.

DEFRA. *FAWC Report on the Welfare of Farmed Animals at Slaughter or Killing - Part 1: Red Meat Animals*. http://www.defra.gov.uk/animalh/welfare/farmed/final_response.pdf.

DEFRA. (2004, April). *Government response to the Farm Animal Welfare Council Report on the Welfare of Farmed Animals at Slaughter or Killing: Part 1 Red Meat Animals*. Press Release 127/04.

Far-right Dutch MP refused entry to UK. (2009, February). Retrieved from [Guardian.co.uk](http://www.guardian.co.uk): <http://www.guardian.co.uk/world/2009/feb/12/far-right-dutch-mp-ban-islam>

FAWC. (2003). *Report on the Welfare of Farmed Animals at Slaughter or Killing - Part 1: Red Meat Animals*.

FAWC. (2009). *Report on the Welfare of Farmed Animals at Slaughter or Killing - Part 2: White Meat Animals*.

FAWC. (1985). *Report on the Welfare of Livestock when Slaughtered by Religious Methods*.

Hansard. (2009, July 20). Retrieved from <http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm090720/text/90720w0061.htm#09072167004014>

Hansard. (2009, May 21). Retrieved from <http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm090521/debtext/90521-0002.htm#09052147000734>

Hickman, M. (2008). Halal and kosher meat should not be slipped into food chain, says minister. *The Independent*, <http://www.independent.co.uk/news/uk/home-news/halal-and-kosher-meat-should-not-be-slipped-in-to-food-chain-says-minister-805396.html>.

HCSN. House of Commons Standard Note *SN/SC/1314*.

Pickthall, M. M. (1938). *The Meaning of the Glorious Qur'an*.

Qur'an, T. S. (n.d.). *Intolerance in the Quran*. Retrieved from The Skeptic's Annotated Qur'an: <http://skepticsannotatedbible.com/quran/int/long.html>

RSPCA. (1995). *Farm Animal Welfare Booklet*.

RSPCA. (2006). *Policies on Animal Welfare (Revised)*.

Viva! (n.d.). *In God's Name - Religious Slaughter in the UK*. Retrieved 2009, from <http://www.viva.org.uk/>: http://www.viva.org.uk/campaigns/ritual_slaughter/index.htm

WASK. (1995). *Welfare of Animals (Slaughter or Killing) Regulations (No. 731)*.