

6 December 2021

# Call for Evidence - Labelling for Animal Welfare: NSS response

Submitted by email: [welfare.label@defra.gov.uk](mailto:welfare.label@defra.gov.uk)

Question 6: Please provide a summary of why you chose to respond to this call for evidence, and any relevant expertise you have.

This submission is made by the National Secular Society (NSS). The NSS is a not-for-profit, non-governmental organisation founded in 1866, funded by its members and by donations. We advocate for separation of religion and state and promote secularism as the best means of creating a society in which people of all religions and none can live together fairly and cohesively. We seek a diverse society where all are free to practise their faith, change it, or to have no faith at all. We uphold the universality of individual human rights, which should never be overridden on the grounds of religion, tradition or culture.

Our vision for secularism includes supporting and upholding the principle of freedom of religion or belief, as provided for by Article 9 of the European Convention on Human Rights. However, this aspect of Article 9 is a qualified right, which means that an interference with the right can be justified in certain circumstances. We maintain that the welfare of animals provides such a justification.

There is consensus among veterinary and animal welfare groups that is more humane to stun an animal before slaughter than not to do so. **For this reason, the NSS thinks religious exemptions should be removed from laws requiring stunning before slaughter. Animal welfare should not be undermined by religious concerns.**

Furthermore, granting specific exemptions to animal welfare laws on the basis of religion undermines community cohesion, inflames existing community tensions and undermines the principle that all are treated equally before the law, regardless of religion or belief. Worse, permitting meat from non-stun slaughter to be supplied on the general market unlabelled undermines freedom of religion or belief, as those with a religious or philosophical objection to eating meat slaughtered in this way do not have adequate means of avoiding it.

Until non-stun slaughter is completely prohibited, **the law should therefore require all products from animals that were slaughtered without stunning to be clearly labelled as such, so that consumers can make informed decisions.**

As part of our campaign work, we have undertaken a number of recent research projects on non-stun slaughter in the UK:

- 2021: We commissioned a poll with Censuswide which found 73% of Brits are unaware that the law does not currently require labelling for non-stun meat, and that 72% support clear labelling for these products. Further stats from this poll have been included later in this

response.

- 2020: We regularly use Foods Standards Agency data to monitor non-stun slaughter figures and warned over a lack of transparency when the Food Standards Agency stopped publishing this data<sup>1</sup>.
- 2018: We found at least 17 councils were supplying non-stunned halal meat to dozens of schools<sup>2</sup>. Our research was reported in the press, including BBC News<sup>3</sup>, The Times<sup>4</sup>, Farming UK<sup>5</sup> and Farmers Guardian<sup>6</sup>.
- 2018: We found meat from animals which have not been stunned before slaughter, without clear labelling to indicate this, is widespread in UK supermarkets<sup>7</sup>.

We regularly engage with parliamentarians, animal welfare experts, veterinarians, farmers, meat suppliers and members of religious communities on the issue of non-stun slaughter.

Some of the previous consultations we have responded to on this issue include:

- 2021: We suggested the Law Commission consider the repeal of religious exemptions from slaughter guidelines in our response to its call for views on its latest programme of recommended legal reforms<sup>8</sup>.
- 2018: We responded to a consultation launched by Lancashire County Council on their proposal to only supply stunned meat to schools. We expressed our strong support for the proposal on animal welfare grounds. As a result of objections raised by ourselves and other groups and individuals, the council decided in October 2018 to stop supplying unstunned halal meat to schools, with the exception of poultry<sup>9</sup>.
- 2018: We responded to a consultation on the draft Animal Welfare (Sentencing and Recognition of Sentience) Bill, raising the point that the outcome of recognising animals as sentient beings and the need to protect them from pain and suffering should result in the end to religious exemptions to animal welfare laws regarding slaughter.
- 2017: We responded to a consultation launched by the Agriculture and Horticulture Development Board over its proposed new quality standards for halal sheepmeat, expressing our support for their goals to add transparency and boost customer choice, but also our concern that the proposed labels were not clear enough for consumers to make an informed choice<sup>10</sup>.

---

<sup>1</sup> <https://www.secularism.org.uk/news/2020/09/nss-criticises-lack-of-transparency-over-non-stun-slaughter>

<sup>2</sup> <https://www.secularism.org.uk/news/2018/10/at-least-18-councils-giving-schools-non-stunned-meat-nss-reveals>

<sup>3</sup> <https://www.bbc.co.uk/news/uk-england-leeds-46268668>

<sup>4</sup> <https://www.thetimes.co.uk/article/parents-left-in-dark-over-inhumane-meat-fjpkcpmj8>

<sup>5</sup> [https://www.farminguk.com/news/-one-in-10-councils-supply-non-stunned-meat-to-schools\\_50507.html](https://www.farminguk.com/news/-one-in-10-councils-supply-non-stunned-meat-to-schools_50507.html)

<sup>6</sup> <https://www.fginsight.com/news/news/campaign-to-ban-non-stun-halal-meat-in-schools--74887>

<sup>7</sup> <https://www.secularism.org.uk/news/2018/01/unstunned-meat-widespread-in-uk-supermarkets-nss-research-reveals>

<sup>8</sup> <https://www.secularism.org.uk/news/2021/08/religious-privilege-causing-injustice-nss-tells-law-commission>

<sup>9</sup> <https://www.secularism.org.uk/news/2018/10/nss-welcomes-lancashire-decision-on-non-stunned-meat-in-schools>

<sup>10</sup> <https://www.secularism.org.uk/uploads/a-response-to-the-agriculture-and-horticulture-development-board-halal-quality-assurance-scheme-consultation.pdf>

Question 16: What barriers are there for consumers wishing to buy food produced to UK baseline welfare or higher? Please provide supporting evidence on the drivers of the value-action gap.

**The lack of mandatory labelling for meat from animals slaughtered without stunning is a severe barrier to consumers wishing to buy food produced to UK baseline welfare or higher.**

The fact that non-stun slaughter is permissible only via a specific religious exemption means that it should always be considered below UK baseline welfare.

**In November this year we commissioned a poll with Censuswide which found well over two thirds of the population, or 72%, think food produced from religious non-stun slaughter methods should be clearly labelled.** Only 4% do not support labelling. Furthermore, 70% think stunning animals before slaughtering them is more ethical, and 60% said they would not want to eat meat that they knew was not stunned prior to being slaughtered.

**The vast majority of consumers (73%) are not aware that there is no requirement for such meat to be labelled.**

Other statistics show the vast majority of the British public (77%) want non-stun slaughter to end outright<sup>11</sup>. That the majority therefore cannot even purchase meat with complete confidence that it was from animals stunned before slaughter is outrageous.

Meat from animals slaughtered without stunning is widely sold without clear labelling. In 2018, 90,000 of the 2.9 million non-stunned animals slaughtered for kosher-certified meat were rejected as unfit for religious consumption and went into the general market unlabelled<sup>12</sup>. In addition, certain cuts such as the hindquarters of cattle are not themselves regarded as kosher and are routinely sold to the general population unlabelled. As United Synagogue explains on their kosher website:

“Before the meat reaches the shop counter, there is one more process to undergo - nikur, porging. This entails the removal of a number of veins and forbidden fats. Because porging is so tricky in the hindquarters of an animal, it is not carried out in most Diaspora communities and this part of the animal is sold to the non-Jewish market.”<sup>13</sup>

The supply of non-stun slaughtered meat to the general market unlabeled may breach the government’s own guidance, which states meat from halal or kosher slaughter “must be intended for consumption by Jews or Muslims”<sup>14</sup>.

We are also concerned by the prevalence of non-stunned meat being supplied to schools, sometimes without parents’ or pupils’ knowledge. An investigation by NSS in 2018 found that that around one in 12 councils provide non-stunned halal meat for school meals, reaching thousands of children across Britain. In many of these schools, there is no separate meat option for children who do not want to eat non-stunned meat. They must have a vegetarian meal instead<sup>15</sup>.

---

<sup>11</sup> <https://www.secularism.org.uk/news/2015/02/mps-cite-overwhelming-public-support-in-debate-on-non-stun-animal-slaughter>

<sup>12</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/778588/slaughter-method-survey-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778588/slaughter-method-survey-2018.pdf)

<sup>13</sup> <https://www.kosher.org.uk/article/what-kosher>

<sup>14</sup> <https://www.gov.uk/guidance/halal-and-kosher-slaughter>

<sup>15</sup> <https://www.secularism.org.uk/news/2018/10/at-least-18-councils-giving-schools-non-stunned-meat-nss-reveals>

A subsequent investigation by *The Times* found that in several cases, schools providing only non-stunned halal meat were not informing parents of the nature of the meat and how it was slaughtered<sup>16</sup>.

Similar problems may occur elsewhere in the public sector, including in hospitals.

Finally, meat from non-stun slaughter is widely sold in supermarkets, without clear labelling<sup>17</sup>. Simply putting the logo of halal or kosher certifiers on products is not sufficient, because the vast majority of UK consumers will be unaware of what the logo represents. Additionally, in the case of halal, some certifiers accept stunning while others do not, adding to consumer confusion.

Despite the government's citation of 'religious freedom' as justification for maintaining the religious exemption on slaughter, the fact that meat slaughtered according to halal or kosher rites can be sold without labelling curtails freedom of religion or belief. The NSS has heard from Sikhs, Hindus, Atheists, Humanists and Pagans who have religious or ethical objections to non-stun slaughter but who have no means of confidently avoiding non-stun slaughtered meat without eliminating meat from cattle, sheep, goats and poultry from their diet entirely.

Unfortunately, the problem is growing. The number of animals slaughtered without stunning has shown a dramatic increase in recent years. In 2013, just 15% of sheep and goats were not pre-stunned, but this rose to almost a quarter (24.4%) of all slaughters between April and June 2017. The number of chickens slaughtered without pre-stunning has increased from 3% in 2013 to 18.5% in 2017<sup>18</sup>.

However, it is becoming more difficult to monitor non-stun slaughter figures. The Food Standards Agency has recently stopped publishing data on the number of animals being slaughtered without pre-stunning<sup>19</sup>. We contacted the Environment Secretary in September to raise this issue, but we have not received any assurances that the FSA will resume making these figures public. As long as non-stun slaughter remains legal, the data on how many animals die via this slaughter method must be made transparent.

We are concerned that the number of animals stunned without slaughter will continue to increase, fuelled by the aggressive tactics used by non-stun halal meat certifier HMC (see Question 22) and by exports of non-stun meat. Labelling is therefore a matter of urgency.

As long as religious groups retain the privilege of an exemption from legislation that prohibits slaughter without pre-stunning, we maintain it is only fair that consumers have the right to information that enables them to avoid such products if they so wish.

**Question 17: Should the UK government reform labelling to ensure greater consistency and understanding of animal welfare information at the point of purchase?**

Yes

---

<sup>16</sup> <https://www.thetimes.co.uk/article/parents-left-in-dark-over-inhumane-meat-fjpkcpmj8>

<sup>17</sup> <https://www.secularism.org.uk/news/2018/01/unstunned-meat-widespread-in-uk-supermarkets-nss-research-reveals>

<sup>18</sup> <https://www.secularism.org.uk/news/2017/10/nss-seeks-end-to-religious-exemption-amid-sharp-rise-in-non-stun-slaughter>

<sup>19</sup> <https://www.secularism.org.uk/news/2020/09/nss-criticises-lack-of-transparency-over-non-stun-slaughter>

## Why?

As stated in our answer to Question 16, it is very hard for consumers to buy meat with confidence in the slaughter method used. **The UK government must reform labelling to ensure meat from animals that were slaughtered without stunning is clearly indicated as such.**

As stated in Question 16, in November this year we commissioned a poll with Censuswide which found 72% of the population think food produced from religious non-stun slaughter methods should be clearly labelled. Only 4% do not support labelling. Furthermore, 70% think stunning animals before slaughtering them is more ethical, and 60% said they would not want to eat meat that they knew was not stunned prior to being slaughtered.

The vast majority of consumers (72%) are not aware that there is no requirement for such meat to be labelled.

**Question 18: How could a set of welfare standards, defining different levels of welfare for an animal, be developed based on inputs? What are the key considerations? You may wish to refer to specific species you have a particular interest in.**

Slaughter method must be a consideration in any set of welfare standards. Any products from animals that were not slaughtered according to baseline standards, including stunning before slaughter, must be clearly labelled as such.

**Question 19: How could welfare outcomes be incorporated into a set of welfare standards that can then be used for a label? You may wish to refer to specific species you have a particular interest in.**

Labelling for meat from animals that were slaughtered without slaughter must be clear and unambiguous. We recommend a separate, stand-alone label for non-stun meat.

**Question 20: What would we need to consider if we developed a set of welfare standards that covered the whole life of the animal, including slaughter and transport, and of its parents? You may wish to refer to specific species you have a particular interest in.**

Slaughter method must be a consideration in any set of welfare standards. Any products from animals that were not slaughtered according to baseline standards, including stunning before slaughter, must be clearly labelled as such.

**Question 21: Should the UK government update the welfare standards set out in the existing marketing standards for unprocessed poultry meat and shell eggs? If so, how?**

In the case of poultry meat, whether or not the poultry was stunned before slaughter in line with UK guidance needs to be included in the standards. We note the following in Article 11 from Commission Regulation (EC) No 543/2008: "When free-range production (points (c), (d) and (e)) is

indicated on the label for meat from ducks and geese kept for the production of foie gras, the term 'from foie gras production' shall also be indicated."

This is no doubt in recognition of the fact that foie gras production is widely regarded as unnecessarily cruel (and as such is banned in the UK), and consumers should be advised on the nature of the product if they wish to avoid consuming products from animals that have been subjected to cruel farming methods.

Following this principle, products from animals that were slaughtered without sufficient stunning, a method also widely regarded as unnecessarily cruel, should be similarly labelled.

**Question 22: Do you think that products containing meat should be labelled to indicate the method of slaughter to consumers?**

**Yes, as a mandatory label**

**Why? Please provide supporting evidence**

**Labelling for meat from animals slaughtered without stunning is overwhelmingly supported by the public.** As stated in our answer to Question 16, 72% of the population think food produced from religious non-stun slaughter methods should be clearly labelled. Only 4% do not support labelling. Furthermore, 70% think stunning animals before slaughtering them is more ethical, and 60% said they would not want to eat meat that they knew was not stunned prior to being slaughtered.

The vast majority of consumers (72%) are not aware that there is no requirement for such meat to be labelled.

There is consensus among veterinary and animal welfare groups that is more humane to stun an animal before slaughter than not to do so. **For this reason, the NSS thinks religious exemptions should be removed from laws requiring stunning before slaughter. Animal welfare should not be undermined by religious concerns.**

Until non-stun slaughter is completely prohibited, **the law should require all products from animals that were slaughtered without stunning to be clearly labelled as such, so that consumers can make informed decisions.**

When an animal is not stunned before slaughter, the animal will only become unconscious and insensitive to pain after prolonged blood loss.

The government's own advisory body, the Farm Animal Welfare Council (FAWC), has said that non-stun slaughter should be banned. The FAWC have concluded that animals slaughtered without pre-stunning are likely to experience "very significant pain and distress" before they become unconscious<sup>20</sup>.

The EU's Scientific Panel on Animal Health and Welfare (AHAW) has stated: "Due to the serious animal welfare concerns associated with slaughter without stunning, pre-cut stunning should always be performed."<sup>21</sup>

---

<sup>20</sup>[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](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)

<sup>21</sup> <https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2004.45>

The Federation of Veterinarians of Europe (FVE) has stated: “FVE is of the opinion that from an animal welfare point of view, and out of respect for an animal as a sentient being, the practice of slaughtering animals without prior stunning is unacceptable under any circumstances”.<sup>22</sup>

RSPCA<sup>23</sup>, Compassion in World Farming<sup>24</sup> and the British Veterinary Association<sup>25</sup> all support an end to non-stun slaughter to improve animal welfare at the time of death.

In 2020 the European Court of Justice ruled that states subject to its jurisdiction may ban non-stun slaughter on animal welfare grounds. The court upheld laws introduced in the Flemish region of Belgium and said restricting non-stun was not an undue infringement of the right to religious freedom, provided it was conducted for a legitimate purpose. The court also noted a scientific consensus that prior stunning was the optimal means of reducing an animal's suffering at the time of slaughter<sup>26</sup>.

Non-stun slaughter, including that according to religious rites, is effectively banned in the following countries: Belgium, Denmark, Slovenia, Sweden, Iceland, Liechtenstein (except poultry), New Zealand (except poultry), Norway, Switzerland (except poultry).

The following countries require religiously-slaughtered animals to receive a stun immediately after their throats are cut, which exceeds the standards for UK religious slaughter: Austria, Estonia, Finland, Greece (except poultry), Latvia, Slovakia.

As the consultation document itself pointed out, 98% of UK consumers value animal welfare. On top of this, 77% want non-stun slaughter to end outright<sup>27</sup>. Yet those consumers cannot easily avoid meat from animals slaughtered without stunning unless they cut all products from cattle, sheep, goats and poultry from their diet.

As long as religious groups retain the privilege of an exemption from legislation that prohibits slaughter without pre-stunning, we maintain it is only fair that consumers have the right to information that enables them to avoid such products if they so wish. However, labelling alone will not end the unnecessary animal cruelty entailed in non-stun slaughter. We therefore make the following recommendations:

### **#1 End the exemptions in law permitting non-stun slaughter**

The only way to ensure animals do not suffer needlessly when slaughtered is to end religious exemptions from requirements that all animals be stunned before slaughter.

### **#2 End all ‘surplus’ non-stun slaughter**

We support the proposed amendment to the Animal Welfare (Kept Animals) Bill, which would introduce quotas on the number of animals that can be slaughtered without stunning by requiring proof of a religious reason for animals to be slaughtered in this way. The law requires that any meat slaughtered without stunning “must be intended for consumption by Jews or Muslims”. The proposed amendment would help to ensure the law is adhered to.

### **#3 End exports of non-stun slaughtered meat**

---

<sup>22</sup> [https://fve.org/publications/slaughter\\_without\\_stunning/](https://fve.org/publications/slaughter_without_stunning/)

<sup>23</sup> <https://www.rspca.org.uk/getinvolved/campaign/slaughter>

<sup>24</sup> <https://www.ciwf.org.uk/our-campaigns/other-campaigns/slaughter/>

<sup>25</sup> <https://www.bva.co.uk/take-action/our-policies/non-stun-slaughter/>

<sup>26</sup> <https://www.secularism.org.uk/news/2020/12/states-may-restrict-non-stun-slaughter-on-welfare-grounds-ecj-rules>

<sup>27</sup> <https://www.secularism.org.uk/news/2015/02/mps-cite-overwhelming-public-support-in-debate-on-non-stun-animal-slaughter>



2018 Food Standards Agency figures revealed nearly a quarter of sheep meat that was not stunned before slaughter was exported from the UK. According to the British Veterinary Association, this equates to around 750,000 sheep being slaughtered without prior stunning per year for consumption outside the UK<sup>28</sup>.

It is clear that the religious slaughter exemption is being abused to boost the UK's halal export industry. For as long as an exemption exists, the number of animals killed under that exemption should be kept to a minimum, and the export of animals that have been slaughtered without stunning should be prohibited.

#### **#4 Ensure 'recoverable stunning' techniques are effective**

We accept that using 'recoverable stunning' techniques may achieve a balance between protecting animal welfare and maximising religious freedom, as some halal certifiers will accept meat from animals that were killed via 'recoverable stun'. However, questions remain about the effectiveness of the current 'recoverable stun' techniques employed in the UK. Compassion in World Farming has expressed concerns that chickens slaughtered for halal meat are not being stunned effectively – they are merely immobilised and can still feel pain<sup>29</sup>.

Recoverable or not, all stunning methods used should render animals insensitive to pain, otherwise they are meaningless.

#### **#5 End supply of non-stun slaughtered meat to schools**

We are concerned by the prevalence of non-stunned meat supplied in schools, sometimes without parents' or pupils' knowledge. We do not think councils should supply schools with meat from animals that have not been slaughtered according to the highest animal welfare standards – let alone without informing parents or pupils.

#### **#6 Improve transparency of non-stun slaughter figures**

We are concerned that the Food Standards Agency has recently stopped publishing data on the number of animals being slaughtered without pre-stunning<sup>30</sup>. We contacted the Environment Secretary in September to raise this issue, but we have not received any assurances that the FSA will resume making these figures public. As long as non-stun slaughter remains legal, the data on how many animals die via this slaughter method must be made transparent.

#### **#7 End the charitable status of organisations supporting non-stun slaughter**

Organisations can easily become registered charities if they exist for 'the advancement of religion'. A number of charities supporting non-stun slaughter have done so; the largest include Halal Monitoring Committee (HMC) and National Council Of Shechita Boards Of Great Britain.

HMC has been criticised by some halal suppliers for aggressive tactics and putting them under pressure by pushing the message that only non-stunned meat is 'genuinely halal'. Because halal suppliers fear losing the trust of their customers, they can feel forced to switch to unstunned halal meat and pay thousands of pounds for HMC certification.

One Huddersfield-based halal butcher alleged to the BBC in 2011 that HMC inspectors threatened him, tried to damage his property and told people in the local mosque not buy his meat<sup>31</sup>. Another

---

<sup>28</sup> <https://www.secularism.org.uk/news/2019/02/britain-risks-becoming-a-hotbed-of-non-stun-slaughter-warns-nss>

<sup>29</sup> <https://www.ciwf.org.uk/contact-us/fags-halal-chicken-slaughter/>

<sup>30</sup> <https://www.secularism.org.uk/news/2020/09/nss-criticises-lack-of-transparency-over-non-stun-slaughter>

<sup>31</sup> <https://www.bbc.co.uk/news/uk-england-12220652>



halal trader stated in a BBC Look North interview that HMC are “really hammering the halal industry” and that “they’re nothing but a scam.”<sup>32</sup>

Because non-stun slaughter is considered to cause unnecessary harm by veterinary and animal welfare groups, we believe promoting it is not fulfilling the public benefit requirement necessary for charitable status. We therefore think organisations existing to support and promote non-stun slaughter should not be given charitable status.

Question 23: If the UK government introduced mandatory or voluntary method of slaughter labelling regulations, should this be:

a) As part of a wider set of animal welfare standards where the label indicates the welfare of the whole life of the animal b) As a standalone label relating only to the method of slaughter

Why? Please provide supporting evidence

**b) As a standalone label relating only to the method of slaughter**

We think that a standalone label relating only to the method of slaughter is the only way to unambiguously communicate whether or not products come from animals that were not stunned before slaughter.

Other labels could also be present to indicate other metrics for animal welfare standards. However, it is essential that consumers can tell at a glance if the product was from non-stun slaughter.

A specific label for non-stun slaughter is necessary because, unlike other slaughter methods, a specific exemption in law exists to enable animals to be slaughtered without stunning. These animals are slaughtered to a standard well below that of all other animals. This is why the majority of Brits are opposed to non-stun slaughter, and why therefore meat sold to the British public needs to be clearly labelled if it is non-stun, so the public can choose to avoid it.

However, labelling will not solve the issue of non-stun meat supplied in schools or other public institutions, unless legislation is also brought in to ensure these institutions clearly communicate if the meat is from animals slaughtered without stunning.

It will also not solve the issue of non-stun meat being exported to other countries.

The best way to solve these many problems caused by non-stun slaughter is to remove the exemptions that enable it.

Question 24: Which type of labelling could be most effective at:

a. Supporting farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market?

Mandatory

---

<sup>32</sup> <https://www.youtube.com/watch?v=M-vya2dPzaE>

b. Improving animal welfare by unlocking untapped market demand for higher welfare products?

Mandatory

c. Ensuring UK baseline and higher welfare products are accessible, available, and affordable so that it is easy for consumers to choose food products that align with their values?

Mandatory

Please select: Mandatory – Voluntary, but defined in law – Industry-led

Why? Please use supporting evidence.

a. Mandatory labelling would be most effective at supporting farmers meeting or exceeding baseline UK welfare standards by helping to balance competition between halal producers that do accept stunning, and those that do not.

As stated in Question 21, HMC has been criticised by some halal suppliers for aggressive tactics and putting them under pressure by pushing the message that only non-stunned meat is 'genuinely halal'. Because halal suppliers fear losing the trust of their customers, they can feel forced to switch to unstunned halal meat and pay thousands of pounds for HMC certification.

Mandatory labelling of meat from animals not stunned before slaughter would renew incentives for halal suppliers to only certify meat from stunned animals.

b. As 77% of Brits want non-stun slaughter to end, there is clearly a high demand for meat that has been slaughtered more humanely. Mandatory labelling to indicate if an animal was slaughtered without stunning would enable consumers to more effectively choose meat from animals stunned before slaughter.

c. A mandatory labelling scheme for non-stun slaughtered meat is the only way to ensure it is easy for consumers to choose food products that align with their values while non-stun slaughter remains legal for Jewish and Muslim communities.

Question 25: To what extent do you support the principle of mandatory labelling to identify when imported meat, eggs and milk do not meet baseline UK welfare regulations?

Strongly support

Why?

Any labelling requirements that apply to meat from animals slaughtered in the UK without stunning must also apply to meat from animals slaughtered outside the UK, or else consumer confidence and choice will be considerably undermined.

**Question 26: What business decisions would farmers and food businesses be likely to take in response to the introduction of mandatory labelling for animal welfare? For example, in terms of what they grow, how they source ingredients, their product range, pricing and how they market to customers.**

We think more producers and suppliers will reject non-stun slaughtered meat. This will include those that currently supply non-stun slaughtered meat. Some halal brands already make a conscious choice to only use meat from stunned animals due to animal welfare concerns. For example, halal supplier Najma states on its website: “We follow the Islamic values of treating all animals with kindness and compassion. To ensure the welfare of the animals, we do use recoverable stunning prior to slaughter.”<sup>33</sup>

**Question 27: How would these business decisions affect the accessibility, availability, and affordability of UK baseline and higher welfare products?**

Mandatory labelling of meat from animals slaughtered without stunning would improve the accessibility, availability and affordability of products from animals slaughtered according to UK baseline standards and higher. It would incentivise more halal producers to opt for ‘recoverable stun’ methods which are far more preferable to no stunning at all. Some Muslims still wish to consume halal meat but due to animal welfare concerns would prefer it to be from animals that were humanely slaughtered.

Similarly, many non-Muslims are indifferent to whether or not their meat was slaughtered according to religious rites – provided the animals were still slaughtered humanely. This means more non-Muslims could also consume halal meat with confidence that the meat was slaughtered according to their values. This increase in demand would in turn increase accessibility, availability and affordability.

**Question 28: How would these business decisions differ if regulations introduced were only voluntary but with welfare standards defined in law?**

A voluntary labelling scheme would be useless, because many suppliers of non-stun slaughtered meat do not want consumers to know how the animals were slaughtered.

Some producers and suppliers of non-stun slaughtered meat want to make the slaughter method clear on the packaging because their target consumers exclusively or primarily hold the same religious viewpoint, i.e. that animals must be slaughtered without prestunning to meet religious requirements.

However, the same cannot be said for suppliers to the mass market – for example, those selling meat via supermarkets, restaurants and takeaways aimed at the general public rather than Muslims or Jews specifically. This is also true of suppliers of products from animals slaughtered via kosher methods that do not meet kosher requirements, who put the products on the general market for non-Jews. In these cases, the unpopularity of non-stun slaughter means it is in the supplier’s interest to keep the slaughter method concealed.

---

<sup>33</sup> <http://www.najmafoods.co.uk/faqs/>

The only way to ensure consumers can exercise true choice is to make a labelling system mandatory for products from animals slaughtered without stunning.

Question 29: Which of the following label formats do you think is most effective?

1. Labels indicating tiers only (Beter Leven)?
2. Labels indicating both tiers and descriptions of the method of production (Etiquette Bien-Être Animal, Haltungsform, CIWF Italia/Legambiente labelling proposal)?
3. Labels describing the method of production only?
4. Labels with only a certification logo (American Humane Certified)?

We are open to different options, provided it is made clear where meat is from animals that were not stunned before slaughter.

What must be avoided are labels that are unclear to those who are not from Jewish or Muslim communities. In 2017 we expressed concerns over the Agriculture and Horticulture Development Board's proposed new quality standards for halal sheepmeat<sup>34</sup>. The board proposed two labels for halal meat: one to show it had been stunned before slaughter and one for 'traditionally slaughtered animals'. The labels were not clear enough to ensure customers have the information they need to make an informed choice, because the two standards marks looked very similar and neither indicated whether pre-stunning has taken place.

Additionally, labels that suggest non-stun slaughter is preferable, superior or more humane than pre-stunned slaughter must also be avoided.

Question 31: For those labels with descriptions of the method of production, which of the following do you think are most effective?

1. Labels with both a written and pictorial description (Etiquette Bien-Être, CIWF Italia/Legambiente proposal)?
2. Labels with only a written description only (Haltungsform)?

We are open to different options, provided it is made clear where meat is from animals that were not stunned before slaughter.

Question 32: Overall, which of the five labels do you think is most effective?

Please select: Etiquette Bien-Être – American Humane Certified – Beter Leven – Haltungsform -- CIWF Italia/Legambiente labelling proposal

Why?

We are open to different options, provided it is made clear where meat is from animals that were not stunned before slaughter.

---

<sup>34</sup> <https://www.secularism.org.uk/news/2017/08/nss-calls-for-clearer-labelling-on-halal-meat>

Question 33: Please can you tell us your views on any domestic or international labels that indicates animal welfare. You may wish to include specific examples to highlight particular features that you like, or dislike.

Please provide any evidence you have on the impact and effectiveness of existing assurance schemes or labelling regulations (domestic and international).

What must be avoided are labels that are unclear to those who are not from Jewish or Muslim communities – please see our answer to Q29.

Question 35: What would the impact be if current mandatory labelling was expanded to indicate the welfare of all unprocessed meat, eggs, and milk, whether imported or domestically produced? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who would be impacted, providing supporting evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. It may be helpful to define and lay out any assumptions on which your answer is based, such as what a set of welfare standards may look like for a given animal.

**Impacts on consumers: Free text**

Mandatory labelling covering slaughter method would enable greater consumer choice for all.

**Impacts on food industry: Free text**

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

**Impacts on farmers: Free text**

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

**Impacts on animals: Free text**

Mandatory labelling covering slaughter method would enable the majority of Brits who object to non-stun slaughter to make a genuine choice to avoid products from such methods. This would reduce consumption of non-stun slaughtered meat and so lead to improved animal welfare. Labelling would also incentivise halal, and possibly kosher, producers and suppliers to switch to stunning methods of slaughter.

But even under a mandatory labelling scheme we anticipate non-stun slaughter would still take place. The only way to end non-stun slaughter is to end the exemptions in animal welfare law for halal and kosher slaughter.

### Question 37: To what extent might any negative impacts of labelling changes be reduced, and how?

Some non-stun slaughter supporters claim mandatory labelling of non-stun slaughtered meat will be an infringement on religious freedom. We think the opposite is true – labelling meat produced via non-stun slaughter will significantly improve freedom of religion or belief.

The fact that meat slaughtered according to halal or kosher rites can be sold without labelling curtails freedom of religion or belief. The NSS has heard from Sikhs, Hindus, Atheists, Humanists and Pagans who have religious or ethical objections to non-stun slaughter but who have no means of avoiding non-stun slaughter meat completely without cutting meat from cattle, sheep, goats and poultry from their diet.

It should also be pointed out that mandatory labelling on meat from animals slaughtered without stunning would also make it easier for those who do want such meat to source it.

We have heard arguments that mandatory labelling of non-stun meat will also unfairly ‘single out’ halal and kosher products. We reject this argument, on the grounds that non-stun slaughter is intrinsically ‘singled out’ because it is an exception in law – all other forms of non-stun slaughter aside from halal and kosher are prohibited.

Finally, we reject arguments that mandatory labelling could result in greater discrimination or hatred of Jews and Muslims. We think improving consumer confidence will help to reduce anxieties about halal and kosher that may fuel prejudice. Many members of the public misunderstand halal meat in particular – the view that all halal meat is from non-stun slaughter is widespread, when in fact the vast majority of halal meat is from animals that have been pre-stunned. A mandatory labelling scheme would help address this understanding by distinguishing stunned from non-stunned halal meat.

Question 38: In Q35 we asked what the impacts would be of introducing mandatory labelling to indicate the welfare of all imported and domestically produced unprocessed meat, eggs, and milk. How would the impact differ if the scope of the labelling was expanded to cover prepacked processed products which are minimally processed with meat, egg, or milk as the major ingredient? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who would be impacted, providing supporting evidence where available. We would like to understand how the impact could vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

#### Impacts on consumers: Free text

Mandatory labelling covering slaughter method would enable greater consumer choice for all.

#### Impacts on food industry: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

### Impacts on farmers: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

### Impacts on animals: Free text

Mandatory labelling covering slaughter method would enable the majority of Brits who object to non-stun slaughter to make a genuine choice to avoid products from such methods. This would reduce consumption of non-stun slaughtered meat and so lead to improved animal welfare. Labelling would also incentivise halal, and possibly kosher, producers and suppliers to switch to stunning methods of slaughter.

But even under a mandatory labelling scheme we anticipate non-stun slaughter would still take place. The only way to end non-stun slaughter is to end the exemptions in animal welfare law for halal and kosher slaughter.

Question 39: Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as primary ingredients? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits and who is impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

### Impacts on consumers: Free text

Mandatory labelling covering slaughter method would enable greater consumer choice for all.

### Impacts on food industry: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

### Impacts on farmers: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

### Impacts on animals: Free text

Mandatory labelling covering slaughter method would enable the majority of Brits who object to non-stun slaughter to make a genuine choice to avoid products from such methods. This would reduce consumption of non-stun slaughtered meat and so lead to improved animal welfare. Labelling would also incentivise halal, and possibly kosher, producers and suppliers to switch to stunning methods of slaughter.

But even under a mandatory labelling scheme we anticipate non-stun slaughter would still take place. The only way to end non-stun slaughter is to end the exemptions in animal welfare law for halal and kosher slaughter.



Question 40: Compared to Q38, how would the impact differ if the scope of the labelling was expanded to cover pre-packed processed products which contain meat, milk and/or eggs as secondary ingredients? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits and who is impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response. You may wish to select a specific product as an example.

**Impacts on consumers: Free text**

Mandatory labelling covering slaughter method would enable greater consumer choice for all.

**Impacts on food industry: Free text**

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

**Impacts on farmers: Free text**

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

**Impacts on animals: Free text**

Mandatory labelling covering slaughter method would enable the majority of Brits who object to non-stun slaughter to make a genuine choice to avoid products from such methods. This would reduce consumption of non-stun slaughtered meat and so lead to improved animal welfare. Labelling would also incentivise halal, and possibly kosher, producers and suppliers to switch to stunning methods of slaughter.

But even under a mandatory labelling scheme we anticipate non-stun slaughter would still take place. The only way to end non-stun slaughter is to end the exemptions in animal welfare law for halal and kosher slaughter.

Question 43: When eating out, what barriers do consumers face choosing food that aligns with their values on animal welfare? How can these be overcome? Please provide supporting evidence. We are particularly interested in evidence that quantifies the availability of welfare information or higher welfare options.

The same issues regarding unlabelled meat from animals slaughtered without stunning sold in shops also occur in restaurants and takeaways. While some restaurants may clearly display the signs “halal” or “HMC” in their premises or on menus, this does not adequately convey how the meat was slaughtered (most UK consumers do not know that HMC only certifies meat from non-stun slaughter). For this reason, extending the mandatory labelling scheme to restaurants and takeaways should be considered.

Question 44: What barriers do mass caterers face in providing welfare information and higher welfare options to consumers? How can these be overcome?

We have found that councils have been subject to intense pressure from religious groups and accusations of “Islamophobia” if they resist supplying meat from animals stunned without slaughter

to local schools, despite the fact that most of the British public are opposed to non-stun slaughter<sup>35</sup>. At many schools supplied by such councils, the only meat option is halal and often parents and pupils are left unaware<sup>36</sup>.

We think the best way to overcome this is for councils to refuse to supply meat from non-stun slaughter to schools. Families who do wish their children to eat non-stun meat at schools can supply a packed lunch.

We also have concerns about meat supplied in hospitals, carehomes and other facilities that are principally funded by the state. Any food that is funded by the state should be from animals that were humanely slaughtered. Certainly, the state should not supply non-stun meat to the public without their knowledge.

Question 45: Which of the following options do you think could be suitable for indicating welfare standards within the catering sector? Please select up to 3 that you would be in favour of.

1. Mandatory labelling of the welfare standard at the point of sale, for example: on the menu
2. Mandatory disclosure of welfare standards available per product, for example: welfare information must be available on request
3. Mandatory disclosure of welfare standards on aggregate, for example: website states percentage of chicken sourced from free-range systems
4. Voluntary labelling of the welfare standard, using marketing terms defined in law
5. Rating for each mass caterer based on their welfare standards
6. No further action and use existing voluntary disclosures.

1. Mandatory labelling of the welfare standard at the point of sale, for example: on the menu

Why? Please provide supporting evidence.

This would be the most transparent method of labelling.

Question 46: In Question 35, we asked what the impacts would be of introducing mandatory labelling to indicate the welfare standards of all imported and domestically produced unprocessed meat, eggs, and milk. How would the impacts differ if the catering sector were required to disclose the welfare standards of meat, milk and eggs purchased? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who could be impacted, providing support evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response.

Impacts on consumers: Free text

Mandatory labelling covering slaughter method would enable greater consumer choice for all.

---

<sup>35</sup> <https://www.secularism.org.uk/news/2018/10/nss-welcomes-lancashire-decision-on-non-stunned-meat-in-schools>

<sup>36</sup> <https://www.secularism.org.uk/news/2018/10/at-least-18-councils-giving-schools-non-stunned-meat-nss-reveals>

#### Impacts on food industry: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

#### Impacts on farmers: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

#### Impacts on animals: Free text

Mandatory labelling covering slaughter method would enable the majority of Brits who object to non-stun slaughter to make a genuine choice to avoid products from such methods. This would reduce consumption of non-stun slaughtered meat and so lead to improved animal welfare. Labelling would also incentivise halal, and possibly kosher, producers and suppliers to switch to stunning methods of slaughter.

But even under a mandatory labelling scheme we anticipate non-stun slaughter would still take place. The only way to end non-stun slaughter is to end the exemptions in animal welfare law for halal and kosher slaughter.

Question 47: Compared to mandatory disclosure, how would the impact differ if the catering sector were required to label food containing meat, milk, and eggs as primary ingredients, for example on menus? Please detail each type of impact (positive or negative), the size of impact, related cost/benefits, and who is impacted, providing supporting evidence where available. We would like to understand how the impacts vary for different groups. If you represent or operate within a particular sector or group, please tailor your response.

#### Impacts on consumers: Free text

Mandatory labelling covering slaughter method would enable greater consumer choice for all.

#### Impacts on food industry: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

#### Impacts on farmers: Free text

Mandatory labelling covering slaughter method would incentivise more humane slaughter methods involving stunning and reward those producers who employ such methods.

#### Impacts on animals: Free text

Mandatory labelling covering slaughter method would enable the majority of Brits who object to non-stun slaughter to make a genuine choice to avoid products from such methods. This would reduce consumption of non-stun slaughtered meat and so lead to improved animal welfare. Labelling would also incentivise halal, and possibly kosher, producers and suppliers to switch to stunning methods of slaughter.

But even under a mandatory labelling scheme we anticipate non-stun slaughter would still take place. The only way to end non-stun slaughter is to end the exemptions in animal welfare law for halal and kosher slaughter.

Question 48: What are the key considerations when designing a monitoring and enforcement regime to verify labels for animal welfare?

Labels for animal welfare should ultimately be enforced by bodies that specialise in animal welfare, e.g. veterinary bodies, specific animal welfare charities etc. If labelling for slaughter method was enforced by bodies in the halal and kosher industry, a conflict of interest could arise where the needs of that industry are prioritised over animal welfare.

Question 53: Are there any examples of product branding or imagery regarding the provenance and quality of meat, eggs, and milk that you think could be misleading? Please provide examples and attach photos or web links if available.

Any labelling for non-stun slaughter should not mislead consumers into thinking non-stun slaughter is more humane.

Question 54: How could a clear and consistent, common labelling approach be best designed to consider animal welfare alongside other labels such as nutrition and eco-labelling? Please consider this from a consumer and business perspective and outline the challenges and opportunities that you see for each.

Consumer perspective: Free text

We think labelling to indicate non-stun slaughter should be a standalone label, due to the exceptional nature of this slaughter method. It must be as clear as possible to the consumer if meat is from non-stun slaughter methods.

Question 55: What are your views on:

a) A label based on a set of production standards on-farm which include both welfare and sustainability criteria for livestock production.

b) Separate labels with one based on a set of welfare standards, and the other based on environmental impact throughout the supply chain, including on-farm

c) An assurance scheme which sets standards based on the extent to which a farm is participating in our new future farming schemes and is delivering environmental and animal health and welfare outcomes

We prefer option b). We think it is clearer for the consumer if animal welfare standards are kept separate, as these do not necessarily relate to environmental impact.