

August 2022

Seeking views on possible changes to public sector food and catering policy- NSS response

Submitted via email: food.procurement@defra.gov.uk

1. Would you like your response to be confidential? (required)

No

2. Who are you responding as? (select one option only)

Campaign group/NGO - In an official capacity as the representative of a nongovernmental organisation / trade union / other organisation

3. What is your role in the public sector food supply chain? (If you have multiple roles, select the one which best represents your interests in this consultation response) (select one option only)

Other (please specify):

This response is made on behalf of the National Secular Society.

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.

More information about our organisation can be found here:

<https://www.secularism.org.uk/about.html>

We welcome the opportunity to respond to DEFRA's consultation. We are responding to this consultation due to our concerns over the policy's implications for those who object to slaughtering animals without stunning for halal or kosher meat.

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.

For this reason, we object in principle to religious exemptions from animal welfare laws that permit animals to be slaughtered without stunning. While this remains legal in the UK, we believe the government should not support, endorse or encourage this form of slaughter. Therefore, non-stun meat should under no circumstances be supplied in public sector food and catering.

We have omitted any questions that are beyond our remit.

4. Which areas of the public sector do you currently carry out this role in? (select all that apply)

Our campaigning work potentially touches on all these areas, but in recent years our work on non-stun slaughter has involved primarily: Central government department or executive agency, School, Local authority.

5. Which region(s) of the UK do you currently carry out this role in? (select all that apply)

South East, London, North West, East of England, West Midlands, South West, Yorkshire and the Humber, East Midlands, North East, Wales, Scotland, Northern Ireland, Outside of the UK (occasionally).

6. Please identify if your organisation is one of the following

None of the above

8.a. Do you think the policy should also be made mandatory for: (select one option per setting)

Early years? Yes

Primary schools? Yes

Secondary schools? Yes

Further education? Yes

Higher education? Yes

Local authorities? Yes

Residential care? Yes

b. Why do you think the policy should, or should not, be made mandatory in these sectors? Please provide details and be clear which setting your explanation refers to.

We think there is a general public expectation that food paid for with public money, in any setting, is of good quality and ethically sourced. We are concerned that at present, meat served in a number of public settings is not meeting these high expectations. We think it should be a mandatory policy for all public sector organisations to only procure meat from animals stunned before slaughter.

Non-stun slaughter: Scientific and public opinion

The scientific consensus is clear that it is more humane to stun an animal prior to slaughter than not to do so. The Farm Animal Welfare Council states that animals slaughtered without pre-stunning are likely to experience “*very significant pain and distress*” before they become unconscious¹.

Likewise, the EU's Scientific Panel on Animal Health and Welfare has stated that: “*Due to the serious animal welfare concerns associated with slaughter without stunning, pre-cut stunning should always be performed.*”² The Federation of Veterinarians of Europe (FVE) has stated: “*FVE is of the opinion that the practice of slaughtering animals without prior stunning is unacceptable under any circumstances*”.³ RSPCA, Compassion in World Farming and the British Veterinary Association also advocate for all animals to be stunned prior to slaughter.

The suffering caused by slaughtering an animal without prestunning is such that the UK government has made it a legal requirement for all animals to be stunned before slaughter. But exemptions are given to animals slaughtered to meet Jewish (*kosher*) or Islamic (*halal*) dietary preferences.

All animals slaughtered for kosher meat in the UK are killed without pre-stunning. No authorities responsible for certifying kosher meat in the UK accept stunned meat.

For halal meat, the situation is more complex. Islamic authorities disagree on whether stunning animals before slaughter is in line with halal requirements. Most halal meat in the UK is from animals that were stunned prior to slaughter, but an increasing number of animals slaughtered for halal meat are not stunned first.

A 2015 parliamentary debate highlighted that 77% of the UK public support a full ban on non-stun slaughter, without religious exemptions⁴.

A survey in 2021 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 labelled⁵.

Non-stun slaughter in meat supplied in the public sector

Despite the overwhelming public opposition to non-stun slaughter, meat from this method is widespread in public sector settings.

Research by the NSS in 2018 found at least 17 councils across the UK are supplying non-stunned halal meat to at least 140 schools⁶. 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.

¹ Farm Animal Welfare Council, ‘Report on the Welfare of Farmed Animals at Slaughter or Killing Part 1: Red Meat Animals’. June 2003 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 Accessed 23 June 2021.

² Blokhuis; et al. (15 June 2004). “Opinion of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals”. The EFSA Journal. European Food Safety Authority. <https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2004.45> Accessed 23 June 2021.

³ Federation of Veterinarians in Europe, ‘Slaughter without stunning causes unnecessary suffering’. 8 February 2019 https://fve.org/publications/slaughter_without_stunning/ Accessed 23 June 2021.

⁴ <https://publications.parliament.uk/pa/cm201415/cmhansrd/cm150223/halltext/150223h0001.htm#15022324000002>

⁵ <https://www.secularism.org.uk/news/2021/12/public-backs-labelling-of-religious-non-stun-slaughter-meat>

⁶ <https://www.secularism.org.uk/news/2018/10/at-least-18-councils-giving-schools-non-stunned-meat-nss-reveals>

Moreover, research by The Times found schools are supplying non-stun halal without telling parents about the origins of the meat⁷.

We have heard concerns that non-stun meat may also be supplied in the armed forces, prisons, hospitals and residential care without consumers knowing the origins of the meat.

Despite the government's repeated statements that it would prefer all animals to be stunned before slaughter, it appears non-stun slaughter is becoming increasingly widespread and normalised. 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 2017⁸.

Although very recent figures from DEFRA indicate non-stun slaughter in 2022 decreased for certain species (sheep), for other species there was no change (cattle) or an increase in non-stun slaughter (goats)⁹.

As of last year, meat from animals slaughtered without stunning even is being sold in parliament¹⁰.

We are disappointed that there is no prohibition on meat from animals slaughtered without stunning in the public sector food and catering policy, as the increase in non-stun slaughter will likely result in an increase in meat from this method supplied in the public sector. We urge DEFRA to introduce a mandatory requirement for all public sector organisations to ensure the meat they supply is from animals slaughtered humanely, i.e. stunned first.

9. Do you think that food retail should be exempt from public sector food and catering policy? (select one option only)

Don't know

We think non-stun slaughter should eventually be phased out of the food industry entirely, including from food retail. Until religious exemptions enabling non-stun slaughter are removed, we think it is reasonable that public sector food and catering is held to a higher standard than commercial food retail – in other words, that public sector organisations only supply meat from animals that were slaughtered without stunning, while food retail continues to operate within the restrictions in the law only.

10. How far do you agree or disagree that the proposed guidance principles will support each of our objectives? (select one option per objective)

Objective 1: Promote procurement of local, sustainable, healthier food and catering

Disagree

⁷ <https://www.thetimes.co.uk/article/parents-left-in-dark-over-inhumane-meat-fjpkcpmj8>

⁸ National Secular Society, 'NSS seeks end to religious exemption amid sharp rise in non-stun slaughter'. 6 October 2017.

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

⁹ <https://www.gov.uk/government/publications/farm-animals-slaughter-sector-survey-2022>

¹⁰ <https://www.secularism.org.uk/news/2021/11/non-stun-halal-and-kosher-meat-served-in-parliament-nss-finds>

Objective 2: Open up public sector supply chains to a wider range of companies, particularly small and medium-sized enterprises (SMEs), to better support local economies, increase resilience, and encourage food producers to innovate

Disagree

Without taking a firmer line against non-stun slaughter, the policies will fail to support SMEs and local stunned halal meat suppliers who are losing to the aggressive tactics of large non-stun slaughter authorities such as the Halal Monitoring Committee (HMC).

HMC has been criticised by some halal suppliers for putting them under pressure by pushing the message that only non-stun 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 meat¹¹. Another 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.”¹²

Objective 3: Increase transparency of food supply chains to drive continuous improvement and build our understanding of what is bought, served, sold and wasted in the public sector

Disagree

We are very disappointed that no aspects of the guidance would improve transparency on non-stun slaughtered meat in the public sector.

11. Do you think there are any ways the proposed guidance principles could better support our objectives?

The guidance principles should include only purchasing meat from animals that were stunned before slaughter. We are very disappointed that despite the introduction of the proposed guidance stating DEFRA’s vision that public sector food and catering is “an exemplar to wider society” in delivering “positive” animal welfare impacts, there are no provisions to prevent public sector organisations from purchasing meat from animals that were slaughtered without stunning. In fact, as we argue in our answer to Q28, some of the proposed guidelines may lead to an increase in non-stun slaughtered meat being purchased by public sector organisations.

As the diagram on p.7 of the proposed guidance principles states, the intended policy outcomes include “increased demand for animal source food from production systems which comply with UK animal welfare standards” and “improved animal welfare standards”.

But by not including a consideration of slaughter method, this guidance will not lead to these outcomes. In fact, the only standard linked solely to animal welfare in Figure 2 of the guidance is “All in-shell and liquid eggs must be sourced from cage-free systems”. There is no mention of the welfare of animals farmed for meat at all, let alone standards relating to slaughter. This omission greatly weakens the guidance.

¹¹ Buttoo, Sanjiv. ‘Row brewing over halal meat regulation’. BBC Asian Network, 19 January 2011. <https://www.bbc.co.uk/news/uk-england-12220652> Accessed 24 June 2021.

¹² BBC Look North interview, available to view at <https://www.youtube.com/watch?v=M-vya2dPzaE> Accessed 24 June 2021.

We note that slaughter is mentioned in 1.3 Animal Welfare in the Animal source foods standards table. However, this simply specifies that meat “must be procured from production systems which comply with UK animal welfare standards”. This should be the bare minimum for *any* supplier, public or not – not complying with this standard is illegal. If DEFRA truly aims for “improved animal welfare standards”, it must aim to deliver above the bare minimum legal requirements – and that includes rejecting non-stun slaughter.

Whether or not animals slaughtered without stunning for halal or kosher meat meets UK animal welfare standards is in itself disputed. DEFRA’s guidance on halal and kosher slaughter says: “the meat must be intended for consumption by Jews or Muslims”¹³. However, we know that a huge quantity of halal and kosher meat is destined for the general public, not just Jewish and Muslim populations. This includes halal meat supplied by public sector organisations such as schools – as we explained in Q8b, children who are not from Jewish or Muslim families are being given non-stun halal meat by their schools, often with no other meat option and without their knowledge. It is therefore arguable that any kosher or halal meat supplied by a public sector organisation, due to its public nature, can never satisfy the legal requirements for the permissance of non-stun slaughter because it is not intended solely for Jews or Muslims and is knowingly supplied to others from outside these communities.

We would like to comment on 3.3 Employer Equality and Diversity Duty in Table 3 Sustainable catering services. The best practice standards are: “Caterers take positive action in building a culture that champions diversity and inclusion”. But religious slaughter methods are inherently discriminatory – kosher authorities will only recognise meat slaughtered by Jews as kosher, and halal authorities will only accept meat slaughtered by Muslims as halal. People of other religions or beliefs cannot work in kosher or halal slaughter, and may face other barriers in the kosher and halal industry as well. DEFRA may wish to also consider this aspect of kosher and halal in its public sector guidance.

Finally, we welcome the inclusion of “Removal of the exemption from compliance with animal welfare standards on the basis of cost” and “Additional detail on UK animal welfare standards, including key system requirements” under “Changes to the standards in the ‘Food sourcing’ section”. But while these changes are likely to lead to higher animal welfare outcomes, they will always be drastically undermined if public sector organisations are permitted to purchase meat from animals slaughtered without stunning.

14. How far do you agree or disagree that the proposed new target will be effective in delivering on the vision that public sector food and catering is an exemplar to wider society in delivering positive health, animal welfare, environmental and socio-economic impacts? (select one option only)

Strongly disagree

As long as the guidance still permits the purchase of meat from animals slaughtered without stunning, we strongly disagree that the new target will be effective in delivering on the vision that public sector food and catering is an exemplar to wider society in delivering animal welfare impacts.

¹³ <https://www.gov.uk/guidance/halal-and-kosher-slaughter>

21. What percentage, if any, do you think the mandatory requirement for food certified to higher environmental production standards should be? (select one option only)

Don't know

As a bare minimum, there should be a mandatory requirement for all meat to be from animals that were humanely slaughtered, i.e. stunned first.

28. a. Standard 2.2: Will it be feasible for public sector organisations to serve food that supports local food traditions and the cultural diversity of the local area? (select one option only)

No

b. If you answered No, which of the reason below, if any, explain your answer? (select all that apply)

Other (please provide details): We are extremely concerned that, without further clarification, a requirement for public sector organisations to “serve food that supports local food traditions and the cultural diversity of the local area” will create a duty for public sector organisations to serve meat from animals that were slaughtered without stunning in areas with significant Jewish or Muslim populations.

We are particularly concerned that Mandatory Standard 2.2. under “Changes to the standards in the ‘Healthier, more sustainable menu choices’ section” says menus must “take account of cultural, *religious*, and special dietary needs of consumers” (emphasis added).

Without any specification that public sector organisations must not supply meat from animals slaughtered without stunning, this sentence appears to create a duty for public sector organisations to actively supply religiously-slaughtered meat where a demand is perceived.

It should be noted that supporting “local food traditions” and “cultural diversity” can create a conflict that is extremely hard to resolve. The prevailing tradition and culture in the UK is to stun animals before slaughter in order to minimise suffering. This conflicts with minority traditions and cultures that oppose stunning before slaughter.

Furthermore, 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 supplied by public sector organisations without clear 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 and are disturbed by the fact that public sector organisations like schools may supply it to consumers, without their knowledge and without any other options.

It should also be noted that the dietary needs of people who prefer to eat non-stun halal or kosher meat can be met by supplying a vegetarian meal. To avoid creating a duty on public sector organisations to serve non-stun meat, the guidance should either specify this, or state that meat from animals slaughtered without stunning must be avoided.

29. a. Standard 2.2: Will it be feasible for public sector organisations to indicate to consumers on menus, or through other means, local produce, UK seasonal produce, and local food traditions? (select one option only)

Yes, although this does not happen currently

As already highlighted, we are aware that public sector organisations are supplying meat from animals slaughtered without stunning without informing consumers.

38. How far do you agree or disagree that the proposed reporting requirements and publication of the data will increase transparency of the public sector food supply chain? (select one option only)

Disagree

Without the policy clearly specifying that meat should only be from animals stunned before slaughter, we have no confidence that there will be improved transparency in this area. As already highlighted, we are aware that public sector organisations are supplying meat from animals slaughtered without stunning without informing consumers, and we are concerned this will become more widespread without additional guidance.

39. How far do you agree or disagree that the proposed reporting requirements and publication of the data will drive continuous improvement across the public sector food supply chain? (select one option only)

Disagree

Without the policy clearly specifying that meat should only be from animals stunned before slaughter, we have no confidence that there will be improved transparency in this area. As already highlighted, we are aware that public sector organisations are supplying meat from animals slaughtered without stunning without informing consumers, and we are concerned this will become more widespread without additional guidance.