

DEPARTMENT FOR FOOD, ENVIRONMENT AND RURAL AFFAIRS CONSULTATION: LABELLING FOR ANIMAL WELFARE

Response from Humanists UK, December 2021



ABOUT HUMANISTS UK

At Humanists UK, we want a tolerant world where rational thinking and kindness prevail. We work to support lasting change for a better society, championing ideas for the one life we have. Our work helps people be happier and more fulfilled, and by bringing non-religious people together we help them develop their own views and an understanding of the world around them. Founded in 1896, we are trusted to promote humanism by 100,000 members and supporters and over 115 members of the All-Party Parliamentary Humanist Group.

We have long campaigned for an end to the exemption from the law mandating pre-stunning for religious groups providing shechita and halal meat. However, if the exemption is not to be brought to an end, then we think at the very least rules should be introduced requiring all such meat to be labelled as such. In 2017, we called upon the Agriculture and Horticulture Development Board to introduce a labelling system indicating whether an animal was pre-stunned or not on all of their approved sheep meat products. In 2018, we responded to a consultation by Lancashire County Council on a proposal to remove unstunned meat from its school meals and the Council subsequently voted in favour of this change. Also in 2018, we responded to a consultation on the draft Animal Welfare (Sentencing and Recognition of Sentience) Bill demanding an end to non-stunned slaughter. We called upon our members and supporters to also respond and over 2,000 did so.

Humanists believe that animals are sentient beings, capable of experiencing pain and pleasure. Thus, we have a moral duty to treat them with compassion and, as far as possible, to eliminate unnecessary pain and suffering which they experience as a result of human behaviour. We endorse five freedoms for animals under human care: freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury or disease, freedom to express normal behavior, and freedom from fear and distress. While we fully respect the right of religious communities to practise their beliefs, such practices can be legitimately limited if they damage the health and morals of our society or infringe upon the rights and freedoms of others. We believe that non-stunned slaughter is a dereliction of our moral duty towards animals and is of sufficient importance to justify a limitation of freedom of religious practice.

QUESTIONS ABOUT HUMANISTS UK

Question 1: What is your name?

Rachel Taggart-Ryan

Question 2: What is your email address?

campaigns@humanism.org.uk

Question 3: Would you like your response to be treated as confidential (required)?

No

Question 4: Are you responding as an organisation or an individual?

Organisation



Question 5: Which of the below options best describes you?

Other: charity

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

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Question 7: Where are you based in the UK?

England

Question 8: Please provide the name of your organisation (optional).

Humanists UK

Question 9: Please provide a summary of what your organisation does and where relevant who you have consulted to formulate your response.

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Question 10: Where does your organisation operate?

England, Wales, and Northern Ireland

Question 11: Where are your organisation's headquarters?



England

Question 12: What type of organisation are you responding for?

Charity

Question 13: Does your business source/sell agricultural or food products?

No

Question 14: What is the primary purpose of your business?

Other: to promote the humanist worldview.

Question 15: Please provide your 5-digit Standard Industrial Classification (SIC) code.

N/A

RESPONSE TO THE CONSULTATION QUESTIONS

Question 16: What barriers are there for consumers wishing to buy food produced to UK baseline welfare or higher?

One of the biggest barriers faced by consumers is the lack of clear, easily recognised information about welfare standards. There are a plethora of different voluntary labelling systems led by different parts of the food industry. This creates a confusing picture for the consumer and requires them to already have a background understanding of the different ways meat, eggs, and dairy products are farmed or produced. What is needed is a government-led mandatory system of labelling that sets the standard for how the welfare baseline is communicated.

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

Yes.

Why?

We believe that consumers have the right to know what is in their food and how it was produced. We call on the UK Government to reform the labelling system for animal produce to ensure that consumers are informed and empowered to make choices about their food in accordance with their beliefs and preferences.

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?

Humanists believe that animals are sentient beings, capable of experiencing pain and pleasure. Thus, we have a moral duty to treat them with compassion and, as far as possible, to eliminate unnecessary pain and suffering which they experience as a result of human behaviour. There is a significant body of scientific evidence which has found that pre-stunning of animals prior to slaughter can alleviate such pain and this method is recommended by all the major animal welfare and veterinary bodies in the UK, including the Government's own Farm Animal Welfare Committee (FAWC), the Royal Society for the Prevention of Cruelty to Animals (RSPCA), the British Veterinary Association (BVA), the Humane Slaughter Association (HSA), and the European Food Safety Authority. The FAWC says that cutting the throat of an animal causes 'such a massive injury [that it]



would result in very significant pain and distress in the period before insensibility supervenes', and as a result advocates compulsory pre-stunning.¹

While the practice of non-stunning remains legal, we believe that the consumers have the right to know how the animals that produced their meat products were slaughtered, so that they can make an informed choice about the products they consume in accordance with their beliefs and conscience. While we appreciate the desire of religious groups to observe dietary requirements connected to their faith, this has to be balanced against competing animal welfare considerations. The introduction of method of slaughter labelling will not in any way impact upon the rights of religious communities or their ability to observe religious practices.

There is currently no requirement for any meat products to be labelled indicating the method of slaughter. However, we believe that such labelling is necessary and important, as there is strong evidence that a substantial amount of non-stunned halal meat is unlawfully entering the general market. The latest Food Standards Agency figures, published in February 2019, show an estimate of 94 million animals were slaughtered without pre-stunning in 2018.² This included 90.8 million meat chickens (9.7 percent of total slaughtered), 3.1 million sheep (25 percent of total slaughtered), and 22 thousand cattle (1.1 percent of total slaughtered). Far in excess of the market share required to fulfil the demand for halal and shechita meat. According to Lord Trees, member of the All-Party Parliamentary Humanist Group and a former president of the Royal College of Veterinary Surgeons, many non-Muslim Britons are inadvertently eating meat from animals slaughtered without pre-stunning. He said that the present system lacks 'accurate traceability' which makes it extremely likely that non-stunned meat is entering the general food market, particularly in pies and processed ready meals.³ This widespread practice is quite possibly unlawful, as the religious exemptions are limited to meat intended to be consumed by Muslims and Jews only. The Government has acknowledged that there is genuine public concern about meat from animals slaughtered without pre-stunning being sold to consumers who have no religious requirement for their meat to be prepared in this way.

Labelling is necessary to tackle this problem at a consumer level, and to give purchasers the power to choose products in line with their belief system, including humanists who hold a belief in the humane treatment of animals and that it is unacceptable to cause animals unnecessary pain or suffering. Setting clear standards for labels detailing methods of slaughter would increase consumer understanding of animal welfare issues and will ensure a greater consistency and accountability in slaughterhouses. The Government's own Farm Animal Welfare Committee first recommended that all meat produced using religious methods 'should be clearly labelled to indicate the method of slaughter' in 1985. Over the intervening 33 years⁴ this recommendation has been

¹ Compassion in World Farming, 'Report Advises Religious Slaughter Without Stunning Should Be Ended' <https://www.ciwf.org.uk/media/3818626/comments-on-fawc-recommendations-on-stunning-before-slaughter.pdf>

² RSPCA, Slaughter without pre-stunning. <https://www.rspca.org.uk/getinvolved/campaign/slaughter>

³ Mark Chandler, 'Unsuspecting Britons "eating halal and kosher meat" in READY MEALS without knowing', *The Express*, 16 February 2018. <https://www.express.co.uk/news/uk/919929/Halal-kosher-meat-ready-meals-Royal-College-of-Veterinary-Surgeons-Lord-Trees>

⁴ RSPCA, 'Slaughter without pre-stunning, March 2016. https://www.rspca.org.uk/search?p_p_id=search_WAR_ptlSearchPortlet&searchKey=slaughter+without+pre-stunning



repeated by the RSPCA,⁵ the BVA,⁶ and the HSA⁷ as well as being recommended for legislation by the European Parliament on two occasions. There is also widespread public support for such a system, with a 2015 study, carried out by the European Commission, revealing that 72% of respondents supported labelling.⁸ Method of production labelling for shell eggs has existed in the UK since 2004 and has been successful in driving higher welfare standards and changing consumer behaviour. We would like to see this success replicated with method of slaughter labelling.

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

As part of a wider set of animal welfare standards where the label indicates the welfare of the whole life of the animal

Why?

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Currently, there is no legal requirement to indicate at point of sale whether an animal was stunned before slaughter. Nor are there specific regulations governing the sale and labelling of halal or shechita meat more generally. Some halal and shechita certification authorities operate accreditation systems for non-stunned meat products in accordance with their own guidelines. As some halal authorities certify stunned meat as halal and others do not, there is a great deal of confusion about how this information is made clear to the public, especially if this meat ends up in a processed product alongside produce from other sources. For example, the Halal Food Authority (HFA) is widely seen to be the major halal certification body in the UK. It allows but does not require pre-stunning using an electric stun set at a low amperage, but does not accredit mechanical stunning. It also accredits providers of non-stunned meat under the badge of 'traditional halal.' A term which of itself does not clearly indicate to most consumers the method of slaughter used. In contrast, the Halal Monitoring Committee does not permit any form of stunning. A number of other assurance schemes cover the general food market including the Red Tractor certification. The Red Tractor scheme seeks to ensure that all products that carry its logo are traceable, safe to eat, and are produced responsibly. It explicitly prohibits meat produced from non-stunned slaughter from

⁵ RSPCA, 'Religious Slaughter' [.https://www.rspca.org.uk/adviceandwelfare/farm/slaughter/religiouslaughter/-/articleName/FAD_AllAboutAnimalsSlaughterReligious](https://www.rspca.org.uk/adviceandwelfare/farm/slaughter/religiouslaughter/-/articleName/FAD_AllAboutAnimalsSlaughterReligious)

⁶ British Veterinary Association, 'Welfare at Slaughter' <https://www.bva.co.uk/News-campaigns-and-policy/Policy/Ethics-and-welfare/Welfare-at-slaughter/>

⁷ Humane Slaughter Association, 'Religious Slaughter Factsheet' <https://www.hsa.org.uk/downloads/related-items/religious-slaughter.pdf>

⁸ European Commission DG Health and Food Safety 'Study on information to consumers on the stunning of animals Final Report' March 2015. https://humanism.org.uk/wp-content/uploads/EU-fci-stunning_report.pdf



being labelled as Red Tractor assured. But again this is not immediately apparent to most consumers at the point of purchase.

The findings of the European Commission's study on consumer information on stunning, found a strong preference for distinctive labels using wording to indicate if stunning had taken place. This study revealed that nearly half of meat purchasers would look for this information.⁹ With the same amount of consumers interested in this information, there is a strong argument that it should form a prominent part of the primary branding and not be hidden away on the back of the package. Of these respondents, 45% (the largest view represented) indicated a demand for two distinctive labels differentiating the two types of slaughter.¹⁰ The study also revealed that over half of respondents believed that a clear written system of identification (i.e. using words such as 'pre-stunned' and 'not stunned') was the best method.¹¹ The UK Government has the power under the Food Safety Act 1990 to introduce a requirement to label all meat products with the method of slaughter but has failed to enact this power so far.¹² Therefore, no new primary legislation is required to make this change.

For more details, information, and evidence, contact Humanists UK:

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⁹ *Ibid.*

¹⁰ *Ibid.*

¹¹ *Ibid.*

¹² House of Commons Library, *Religious Slaughter of Animals*, 18 February 2015, p24 <http://research.briefings.files.parliament.uk/documents/SN07108/SN07108.pdf>

