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The reality of 'humane' slaughter in the UK

Nearly 1000 million land animals were slaughtered in the UK in 2014 (Eurostat, 2015). Over 200 thousand tonnes of farmed fish (CEFAS, 2015) and 700 thousand tonnes of wild fish (Eurostat, 2016) were harvested by the UK in 2012 and 2015, respectively. The on-going slaughter (the killing of animals for human food; OED, n.d.) is governed by the EU Directive 1099/2009 (EU, 2009). Each nation of the UK has developed similar regulations to adhere to this directive with their own method of implementation (WATOK [Welfare of Animals at Time of Killing] Regulations; HM Government, 2012-2015a). The term *humane killing* or *humane slaughter* is used within the WATOK regulations and other key legislation across the globe such as the USA's commonly known Humane Slaughter Act (USDA, 1978). The phrase 'humane slaughter' also returned 3530 Google Scholar results on 11 December 2016. Despite such common use of the term, an official international or even EU-wide definition for the term does not seem to exist.

The Humane Slaughter Association ([HSA] n.d.) and the RSPCA (n.d.) deem pre-slaughter stunning that renders each animal unable to feel pain as an essential component of humane slaughter. Compassion in World Farming (CIWF, n.d.) elaborates on this, stating that: stunning and killing must be immediate; that the stunning process should not induce stress or pain; and that transportation and handling should be kept to a minimum and conducted in a way that minimises stress. This essay examines whether large-scale UK slaughter merits the title humane and what impact UK legislation has in reality on a day-to-day basis for animal welfare during large-scale slaughter.

Current science and legislation regarding slaughter in the UK

There is general scientific consensus that animals (at the very least mammals and birds) are sentient; that is, they are conscious and aware, and they have the ability to feel a range of affective states in addition to pain and pleasure (Proctor *et al.*, 2013; Broom, 2015). Evidence also suggests that fish feel pain (Braithwaite and Ebbesson, 2014; Balcombe, 2016). This has spurred the EU's leadership in animal welfare (Farm Animal Welfare Education Centre; FAWEC, 2015). A host of EU animal welfare legislation has followed; for example, the statement that animals are sentient beings in The Treaty of Lisbon (2007), the outlawing of unenriched cages for chickens in 2012 (EU, 1999) and the aforementioned EU Directive (EU, 2009).

Relative to the preceding legislation (see HM Government, 1995), the main new features of WATOK in respect to large-scale slaughter are as follows: pre-slaughter stunning is compulsory for all animals in all instances except for fish and religious slaughter; an Animal Welfare Officer is required in all abattoirs unless slaughtering 'less than 1,000 livestock units of mammals or 150,000 birds or rabbits per year' (European Commission, 2012; p.25); standard operating procedures are required for slaughter and handling; and certificates of competence are required for all staff handling animals in lairages and for all slaughterers (Food Standards Agency [FSA], 2015a).

Despite such progress, there is currently neither EU nor UK legislation governing the slaughter of fish for human consumption. According to the British Veterinary Association ([BVA] 2015), without stunning, fish can suffer for at least 15 minutes before a state of insensibility is reached after being slaughtered. None of the WATOK regulations in the UK refer to large-scale fish slaughter specifically, and the EU Directive 1099/2009 simply states that fish should be 'spared any avoidable pain,

distress or suffering during their killing and related operations' (Article 3:1) with no details on what is permissible (EU, 2009).

The reality of UK slaughter

In 2016, The Bureau of Investigative Journalism (BIJ) learnt through a Freedom of Information request that 4455 animal welfare breaches in registered UK slaughterhouses occurred between July 2014 and June 2016. The vast majority of these breaches pertained to slaughter or pre-slaughter; for example, chickens being boiled alive, production line breakdowns leading to animals suffering, truckloads of animals suffocating or freezing to death, ineffective stunning, inhumane handling and animal abuse. One breach relates to one incident, not to the number of animals affected, meaning one breach could cause suffering for hundreds of animals. Moreover, the aforementioned breaches concern severe breaches only; with minor breaches included, the figure rises to 9511. Data were collected back to 2011 with the animal welfare breaches between 2011 and 2014 totalling 6859. This means the number of animal welfare legislation breaches increased significantly over these five years. Undercover footage by Animal Aid (2015) from 10 UK slaughterhouses revealed cruelty and breaches of animal welfare legislation in nine of them. If current legislation is deemed as a humane approach to slaughter, evidently its implementation and enforcement need to be drastically improved.

Animal suffering also poses costs to human welfare. So-called mirror neurons can be activated in humans when they witness or even think of an experience of another, even across different species. This can create empathy for and a vicarious experience of farm animals' pain in humans (Broom, 2014). In contrast, abattoir staff are thought to desensitise themselves as much as possible in order to complete their

work and can be prone to post-traumatic stress syndrome (Victor and Barnard, 2016). Slaughter line speeds can be exceedingly high; for example, up to 35 chickens can be processed each minute (Harmse *et al.*, 2016). The immense pressure, monotonous movements and unpleasant environment are thought to be responsible for the industry's record of high staff turnover and absenteeism (Victor and Barnard, 2016).

Defences of the current slaughter processes and legislation in the UK

The EU Animal Welfare and Health Audit of the UK in 2014 (European Enforcement Network, 2014) provides good feedback regarding welfare at slaughter. No infringements regarding welfare legislation at slaughter were listed in this report apart from concern surrounding the electric water-bath for chickens; however, it is noted that this was due to religious rites and because the EU Directive had not yet been implemented. This is a dramatically different conclusion concerning welfare at slaughter and the extent to which slaughter legislation is followed compared to the BIJ findings and undercover footage gathered by Animal Aid. Information from these three sources was gathered at a similar time, but the duration of time over which information was collected and the body responsible for data collection differed. The EU audit lasted one month and notice was given to slaughterhouse management. The BIJ findings originated from veterinarians and hygiene inspectors working on behalf of the FSA (the government body responsible for food safety and hygiene across the UK, including legislation enforcement) over a two-year period. The undercover footage was secretly filmed by individuals not perceived as an authority by slaughterhouse staff. Perhaps with sufficient notice and for a limited period of

time, it is possible for slaughterhouse management to maintain conduct in line with legislation.

The FSA (2015b) conducted unannounced inspections in February and March 2015. The results of these inspections showed that legislation was generally being followed; for example, 96% of FSA officials and 87% of business operators were considered 'good' (p.3); however, Rotherham *et al.* (2016) suggest that these 'unannounced inspections' may have been leaked by the media. Arguably, the method of data collection and the individuals or body collecting the data can impact the findings.

The FSA (n.d.) notes that some structural layout legislation changes are not due until 2019. There is also hope that legislation concerning fish slaughter will soon be in place (FAWEC, 2015). Whilst these future steps are welcome, considering the aforementioned problems associated with the enforcement of other animal welfare legislation, it is clear that legislation alone will not ensure a humane death for animals.

HM Government (2015b) refers to the UK's position amongst 'the top four countries in the world for animal welfare' (p.6) as recorded in the Animal Protection Index (API; World Animal Protection, 2016). However, the API does not look beyond legislation into how the UK and other countries fare regarding implementation and enforcement. According to the Centre for Animals and Social Justice ([CASJ] 2015), Defra's 25-year plan for food and farming excludes animal welfare goals on account of the UK's supposed leading position in animal welfare. CASJ (2016) claims that 'one major factor sustaining the "animal use" policy paradigm is the dubious narrative claiming that the UK has the world's highest animal welfare standards' (p.1).

Anil (2014) describes the religious reasons for non-stun slaughter methods. There is consensus that non-stun slaughter inflicts unnecessary pain (BVA, 2015).

Exceptions should not be made in the law for religious slaughter, especially if stunning does not kill the animals, meaning it would arguably not be in conflict with religious beliefs (Gross, 2016). The argument also appears inconsistent and selective in its approach; for example, the Jewish faith acknowledges the moral problem of eating meat, detailing that only individuals of a high moral standard should be slaughterers so they can resist 'the callousness that killing animals may engender' (Gross, 2016; p.4), but there is an absence of campaigns to ensure this. Across the world, animal sacrifices are being increasingly banned due to the cruelty involved despite some religious-based protest (e.g., see Cid, 2016). The same cultural evolution could occur concerning religious slaughter methods.

The best-case scenario for slaughter in the UK

Even assuming the perfect implementation of legislation, substantial animal welfare problems will remain. As Stanescu (2013) remarks, 'humane farming, even if animals are given a name or a little more room, can never truly exist' (p.106). Animals have been taken from the location and people they have known for much of their lives and placed into unfamiliar surroundings that continue to change for what remains of their lives. Pre-slaughter, animals are fasted, so lack the comfort of their normal food. One reason for this is to protect public health in case any faeces contaminate the animal produce. However, this is also practiced for the convenience of slaughterhouse staff so there is less faeces to deal with before slaughter and less mess during slaughter. Achieving the excessive slaughter line speed necessitates the movement of animals at unnatural speeds down the *race* (the route between the lairage and slaughter

pen). This can result in the need for coercion by staff. Good human-animal relationships are conceivably unlikely at this final stage of the animals' lives as the animals are in unfamiliar and unnatural surrounds with unfamiliar people (Velarde and Dalmau, 2012).

The EU's Welfare Quality project (Welfare Quality, 2009a) is perceived as superior in its approach to animal welfare; for example, because of the size of the project and use of animal-based indicators rather than environmental indicators to assess animal welfare (Blokhuis *et al.*, 2010). Yet, its animal welfare assessments do not appear to measure the expression of social or normal behaviours during animals' time at a slaughterhouse (Welfare Quality, 2009b). This suggests that conditions are such that natural behaviours are not expected to be exhibited at all. Moreover, the extent of kicking, struggling or vocalisations in animals appears to be considered indicative of animals' 'positive mental state' (p.59). This is arguably misleading as the absence of such behaviour does not necessarily signify a positive state. It may not even indicate a neutral emotional state. Perhaps the animals' emotional state is merely insufficiently negative to merit a physical or vocal expression of any discomfort being experienced. Fear can also provoke different reactions in different individuals. Fear may even inhibit such behaviour in some individuals (Forkman *et al.*, 2007).

Many unacceptable factors on a farm in terms of animal welfare seem to become acceptable in the slaughterhouse (e.g., ignoring positive affective states and animals' need to practice natural behaviour and be in a natural environment). Thus, it is difficult to see how such end-of-life conditions can be seen as humane. Death itself is also increasingly treated as a welfare issue, regardless of the conditions under

which it occurs. This is due to the potential positive affective states being denied an animal if it is killed (Yeates, 2010).

Solutions to current welfare issues with UK slaughter

Mobile slaughterhouses can seem an attractive alternative to long journey times and the need for animals to part from the farmer and farm they know well. Several studies indicate that mobile slaughterhouses may offer greater welfare for animals than conventional facilities (e.g., Eriksen *et al.*, 2013; McCorkell *et al.*, 2012).

However, they also appear to pose additional economic, logistic and legal issues to such an extent that the HSA (n.d.[b]) does not recommend them and the Farm Animal Welfare Committee (FAWC, 2003) questions their current feasibility. These additional challenges may account for any studies suggesting lower welfare provisions when using mobile slaughterhouses (e.g., the study discussed by Knight, 2016). Even if a welfare issue appears to have a technical cause, it may be a side effect of root economic, logistic and legal issues. This area requires more research and investment.

Switching to farming insects is another option. This could diminish the environmental problems associated with animal agriculture and remove the health problems associated with the consumption of animal products (Hanboonsong *et al.*, 2013). Moreover, at least some of the welfare issues associated with animal agriculture could be removed as it would be far simpler to breed and process such tiny creatures whose level of consciousness is thought to be quite limited (Tiffin, 2016). Nonetheless, it is unknown whether insects feel pain or not (Tiffin, 2016), so it seems unwise to shift from current animal farming to insect farming as it could result in similar problems in the future. The mass destruction of animal life is debatably never

respectful to life, especially when humans do not need to consume meat and dairy to thrive (Tuso *et al.*, 2013). Slaughter is not an evil that has to be borne by society.

The guidelines from animal welfare specialist bodies including the BVA (2016) and OIE (2016) are a step in the right direction. Their recommendations should definitely be ratified into law and will help with forming an international definition of humane slaughter. But this alone seems insufficient as highlighted in the best-case scenario section of this essay.

Shriver (2009) argues that animal welfare advocates should support the creation of animals that are genetically modified to not feel pain. Whilst this would be preferable to the current situation, it is doubtful whether the public would accept this given the current controversy surrounding genetically modified crops (Dunwell, 2014; Frewer *et al.*, 2014). This option would also lack the other benefits possible (for humans and animals) in the alternative outlined below.

Assuming animal slaughter is to continue in some way, arguably the only way to ensure care for each animal as an individual and to devote the time and energy required to give each individual a truly peaceful death is if humans significantly reduce their animal product intake. CIWF (2016) outlines different agroecology options in their *Fair Food and Farming* report. Humans are known for their advanced cognition and altruistic capabilities (Mannings and Dawkins, 2012). Perhaps we should use these qualities to move away from intensive animal agriculture.

Mandatory CCTV could be installed in the remaining facilities as supported by FAWC (2015) and deemed financially feasible by Rotherham *et al.* (2016). Whilst it is true that roughly 57% of slaughterhouses already voluntarily have CCTV, this is not all slaughterhouses, the CCTV is not in all areas and some slaughterhouses are

resisting sharing their footage with the FSA (2015b). The FSA (n.d.) notes that there is often insufficient space in the pens to observe slaughter, which highlights another reason for the need of CCTV. Moreover, Animal Aid's undercover footage included slaughterhouses with CCTV. This emphasises the need for independent and effective monitoring of the CCTV once installed (Rotherham *et al.*, 2016). As the majority of welfare breaches occur before arrival at the slaughterhouse, CCTV in vehicles used to transport animals to abattoirs could also help to ensure animal welfare (BIJ, 2016).

Conclusion

It is highly questionable whether slaughtering at such high numbers can ever be humane even with the best legislation and legislation enforcement. It is encouraging that the number of animals slaughtered in the UK seems to be decreasing (e.g., see AHDB Dairy, 2016). This highlights that people's efforts to reduce or eradicate meat and dairy from their diet is helping some animals. However, humans find behaviour change immensely difficult (Kelly, 2016), thus such initiatives need to be supported by government and business so that a culture is created whereby eating significantly less (or no) meat and dairy is respected, encouraged, desired and admired. CASJ (2016) notes that '[a] fundamental factor blocking animal protection is the persistence of an "animal use" paradigm across Whitehall' (p.4). Such an outlook will only foster efforts to minimise animal suffering where it is convenient, regardless of what the field of animal welfare science brings to light.

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