



FVE STATEMENT

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Non-stun slaughter causes severe animal suffering: national rules stricter than EU Regulation must be allowed.

The Federation of Veterinarians of Europe (FVE) – the European umbrella organisation of veterinary professional organisations from 39 countries, represents around 300 000 veterinarians. FVE strives to promote animal health, animal welfare, public health and the protection of the eco-systems across Europe.

FVE calls upon the European Court of Justice **to rule opposite to the opinion of Advocate General Hogan** in C-336/19, declaring that the EU Slaughter Regulation¹ would not allow for a ban on slaughter without stunning.

Slaughtering animals without stunning – by cutting the throats of fully conscious animals – leads to **severe animal suffering**. It goes against the Treaty that recognizes animals as sentient beings and states that full regard should be paid to the welfare requirements of animals.

FVE strongly believes that the EU Member States should be allowed to apply stricter rules with respect to slaughter without stunning. In FVE's opinion, the Slaughter Regulation clearly intends to do so, for example in Recital 18 *'to enjoy "a certain level of subsidiarity" when governing religious slaughter'* and in Art. 26(2) let. c *"to adopt "stricter standards" in relation to inter alia the "slaughtering and related operations of animals"*, something several countries have made use of over the years.

EU Member States as Slovenia, Finland, Denmark, Sweden and two regions of Belgium (Flanders and Wallonia) should be allowed to maintain their legislation and to remain **allowed to use the principle of subsidiarity and to adopt stricter standards** regarding slaughter without stunning.

Already in 2002, all FVE members unanimously adopted 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. As many veterinarians work in slaughterhouses, our professions knows all too well what suffering slaughter without stunning brings.

Slaughter without stunning leads to severe welfare consequences. Farm animals are just as sensitive to pain as humans. During slaughter without stunning the animals will seriously suffer until they become unconscious due to loss of blood. Studies show that during the

¹ <https://eur-lex.europa.eu/eli/reg/2009/1099/oj>

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period of consciousness the animal is exposed to extreme pain and suffering. Moreover, slaughter without prior stunning requires almost always extra restraint, which may cause additional stress to the already frightened animal. Whilst properly stunned animals do not suffer, animals killed without stunning will be in pain, in some cases for up to several minutes.

Alternative methods, such as the use of reversible stunning and during or just post-cut stunning, which greatly reduce the animal suffering should not be ignored.

FVE is not alone in its opinion. Recently the **European Food Safety Agency** also released a publication on ‘Welfare of cattle at slaughter²’ in which the Agency expresses serious concerns around slaughter without stunning. The EFSA opinion identifies 16 hazards connected with slaughter without stunning (p77 EFSA opinion). EFSA also made a list of suggested corrective measures for these hazards, however, concluded that for some hazards no corrective measures are possible and that **pre-cut stunning is the only preventive measure to take away the welfare consequences** (p 82-85 EFSA opinion).

The opinion that animals should be treated as sentient beings is shared not only by veterinarians and scientists but also by the majority of the **citizens**. A recent poll³ of 23,126 adults in 24 European countries showed that 89% agreed that it should be mandatory to make animals unconscious before they are slaughtered.

In his opinion, Advocate General Hogan, notes that it is against the Treaty that meat resulting from the slaughter of animals without stunning is simply allowed to enter the general food chain to be consumed by customers who are unaware. FVE shares this concern. In some Member States for some animal species, non-stun slaughter has become the general rule, instead of the exception, resulting in large quantities of meat derived from animals slaughtered without stunning entering the main food chain.

We strongly plea that this meat should be clearly labelled to enable all consumers to make an informed choice based on welfare, ethics or personal belief when purchasing such products.

FVE wishes to differentiate between ‘non-stun’ slaughter and ‘religious’ slaughter. We want to emphasise that our concern is not related to religious practices but with killing by cutting the throat of fully conscious animals without stunning. FVE, therefore, advocates that labelling should refer to non-stun slaughter rather than a method of religious slaughter.

To conclude, FVE asks the Court to allow EU Member States the continuous use of the principle of subsidiarity and to allow them adoption stricter standards regarding slaughter without stunning, while at the same time making it obligatory to label ‘non-stun’ meat.

Further information can be found in:

- FVE position on labelling meat from animals slaughtered without stunning <https://fve.org/cms/wp-content/uploads/030-fve-position-labeling-meat-from-animals-slaughtered-without-stunning-final.pdf>
- FVE position on slaughter without stunning

² <https://www.efsa.europa.eu/en/efsajournal/pub/6275>

³ https://www.eurogroupforanimals.org/sites/eurogroup/files/2020-10/2020_10_09_opinion_poll_results_sws.pdf