



European Commission
Directorate General for Health and Food Safety

Study on information to consumers on the stunning of animals

Executive summary

Framework Contract for evaluation
and evaluation related services - Lot 3: Food Chain

Submitted by:

Food Chain Evaluation Consortium (FCEC)

*Civic Consulting - Agra CEAS Consulting -
Arcadia International - Van Dijk Management Consultants*

Project leader: Agra CEAS Consulting

in collaboration with **Pragma s.r.l.**

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S1. Executive summary

S1.1. Terms of reference

Recital (50) of Regulation (EU) No 1169/2011 *on the provision of food information to consumers* states that:

“(50) Union consumers show an increasing interest in the implementation of the Union animal welfare rules at the time of slaughter, including whether the animal was stunned before slaughter. In this respect, a study on the opportunity to provide consumers with the relevant information on the stunning of animals should be considered in the context of a future Union strategy for the protection and welfare of animals.”

This study was therefore planned in the EU strategy for the protection and welfare of animals 2012-2015¹. The Food Chain Evaluation Consortium, led by Agra CEAS Consulting and with input from Pragma Research, was awarded the contract.

Regulation (EC) No 1099/2009 *on the protection of animals at the time of killing* became applicable from January, 2013. As a general rule, this legislation requires that animals are rendered unconscious (stunned) prior to slaughter. However, it allows slaughter without stunning for particular methods of slaughter prescribed by religious rites, provided that it takes place in a slaughterhouse. In practice, the derogation is used in the case of slaughter under the Jewish rite (for Kosher meat) and under the Muslim rite (Halal meat).

This derogation from stunning is designed to respect freedom of religion and the right to manifest religion or belief in worship, teaching, practice and observance, as enshrined in Article 10 of the Charter of Fundamental Rights of the European Union.

Concerns have been raised that, mainly for economic reasons, animals are slaughtered without pre-stunning in excessive numbers. Part of this production may be then released on the secular market where it may be purchased unwillingly by consumers, some of them possibly preferring to avoid such meat.

In the light of this potential information gap, the purpose of this study was:

1. to carry out a consumer consultation in all Member States in order to collect comprehensive, reliable data and use it to provide an analysis which indicates whether consumers want to receive information on the stunning of animals when they buy meat; and,
2. to consult stakeholders at the EU level and in selected Member States on the issue.

S1.2. Methodology

Information was gathered for this study via a literature review, exploratory semi-structured personal interviews with stakeholders and Commission staff, a Computer-Assisted Telephone Interview (CATI)

¹ COM(2012) 6 final/2.

survey of 13,500 purchasers of meat, 500 in each of the EU-27 Member States², a focus group with EU-level stakeholders and six Member State case studies.

The survey was carried out in July and August, 2013 and was based on the population aged over 18 which purchases beef, lamb and poultry. The results were weighted to the EU-27 population with a sampling error at a 95% level of confidence in each Member State of $\pm 4.4\%$ and $\pm 1.0\%$ for the EU-27. To facilitate analysis, an EU-15 group (comprising Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden and the UK) and an EU-10 group (Bulgaria, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia, Slovenia) were created. The sampling error for both groups was $\pm 1.4\%$.

A consultation document, based on the findings from the consumer survey was produced. This was provided to EU-level stakeholders and used as the basis for a facilitated consultation which took place in January, 2014. Case studies were carried out in France, Germany, Poland, Spain, Sweden and the UK in February and March, 2014.

S1.3. Conclusions

S1.3.1. Consumer interest in receiving information on stunning

Our survey asked respondents to spontaneously state the three main purchase criteria they use when buying meat. The main purchase criteria used are aspects of quality, mainly presentation and durability (66%) and price, mainly in unit terms (16%). Only 2% of meat purchases cited production method as the most important purchase criterion, 1% religious consideration and 1% general animal welfare considerations; no respondents spontaneously mentioned animal welfare at slaughter as a purchase criterion. Those who purchase meat are also generally satisfied with the information available on meat and meat products (80%, 17% “very satisfied” and 63% “satisfied”).

Stakeholders agreed with the survey findings which suggest that there is little dissatisfaction with current labelling with regard to meat and meat products and little spontaneous demand for information related to animal welfare at slaughter. However, stakeholders pointed out that this is an important issue for a small number of relatively vocal consumers.

The absence of apparent widespread demand for information as a purchase criterion does not, however, preclude the possibility that consumers expect certain standards to be adhered to for all products (as reflected to an extent by the proportion of survey respondents who believed there are laws covering slaughter, see below).

Survey respondents were also asked directly whether they would be interested in receiving information on the stunning of animals at slaughter when they buy meat. This direct enquiry elicited greater interest with 72% of respondents indicating interest to varying degrees (18% “very interested”, 27% “quite interested” and 27% “a little interested”). Consumer interest in receiving information on how authorities check the rules on the protection of animals at slaughter was investigated in the survey and this revealed that 48% of meat purchasers would look for this information compared to 40% who

² Croatia became a Member States after the contract was signed.

would not. Respondents were also asked whether meat from animals which had not been stunned should be sold using similar labelling to meat from animals which had been stunned. While 23% of respondents do not feel that this is an issue for them and 23% think that similar labelling should be used, 45% think that the labelling should be different.

Our survey suggests that there is generally lower consumer interest in this issue in the EU-10 than in the EU-15. However, within these groupings meat purchasers in different Member States have different levels of interest. Interest in labels to differentiate meat from stunned and unstunned animals is higher than the EU-27 average in Ireland, Belgium and France. Meat purchasers in Poland, Slovakia and Spain have a lower than average interest in labelling and are less likely to think that meat from stunned and unstunned animals should be differentiated via labelling.

These findings highlight the difference between spontaneously expressed purchase criteria and prompted interest in a specific issue. The current absence of direct labelling means that consumers are unable to easily use pre-slaughter stunning as a purchase decision criterion. However, this does not mean that consumers are uninterested in this issue; though there is limited consumer understanding of slaughter practices (see below). Furthermore, stakeholders feel that general consumer interest in this issue is low and that at least some of the interest shown is for reasons other than animal welfare.

Our conclusion is that for most consumers information on pre-slaughter stunning is not an important issue unless brought to their attention. However, this is an issue for a certain proportion of motivated consumers. It is by no means clear that consumers would actually act on this information if it were to be available. The level of interest differs by Member State with generally greater interest in the EU-15 compared to the EU-10.

S1.3.2. Consumer understanding of slaughter practices

Survey respondents were asked whether they think that there are laws covering the stunning of animals in their Member State. Half (49%) thought that there are laws with 18% saying that they did not think there are laws and 33% saying that they do not know. Respondents were then told that there are laws requiring the stunning of animals and were asked whether they thought that these applied to all animals slaughtered in their Member State. Less than a third (28%) believed that legislation covers all animals while 38% believed that it does not. It is not possible to draw a robust conclusion from this in terms of whether respondents have a good understanding of the legislative position because it is unclear to what extent respondents think that there are laws that are not followed or that there are legal exemptions (which is actually the case through the religious derogation).

Stakeholders were overwhelmingly of the opinion that consumers have little understanding of the slaughter process. Stakeholders believe that consumers frequently conflate religious slaughter with unstunned slaughter, a misunderstanding not helped by the presentation of this issue in the media. Stakeholders also believe that the majority of consumers are not interested in the process of slaughter, so that even where accurate information is available, this is not something that is typically sought.

Our clear conclusion is that there is little accurate consumer understanding of the slaughter process.

S1.3.3. Modalities for labelling to indicate whether animals have been stunned

Those survey respondents who had expressed interest in receiving information on whether meat was from stunned or unstunned animals (79.4%) were asked whether they would also want to know the method of stun. Almost half (47% of those expressing an interest, 37% of all meat purchasers) said that they would. Some 38% (30% of the total) said that they would only want to know whether the animal was stunned.

This is a very different finding to the perception of stakeholders who largely felt that only information on whether an animal was stunned or not was relevant to consumers. Some religious organisations took a different point of view noting that the method of stun is an important piece of information necessary to make a fully informed decision. This issue should be considered against the background of the perceived lack of consumer knowledge on slaughter methods which calls into question how consumers would use this extra information to make an informed purchase decision. Additionally, there are a number of permitted stunning methods under Regulation (EC) No 1099/2009 and no clear indication of how these compare to one another in animal welfare terms; it is the outcome that is important and all render the animal insensible to pain. It is therefore unclear how providing this additional information would help even a well-informed consumer to make a purchase decision. Finally, this finding should be placed within the context of very low levels of expressed consumer interest in general animal welfare as a purchase criteria.

If there is little expressed use of animal welfare as a purchase criterion, little understanding of the slaughter process and an inability to distinguish between different methods of stun, providing information on the different methods used would not appear to aid a consumer decision. Our conclusion here is therefore that information on the method of stun is not relevant to the vast majority of consumers in terms of providing a purchase decision criterion. However, to a minority of religious stakeholders providing information on all methods of stun would be seen as equal treatment should labelling of non-stunned meat become compulsory.

Survey respondents who had expressed interest in receiving information on whether meat was from stunned or unstunned animals were asked whether this information should be conveyed using a textual description or using a numeric code. A slight majority (53% of those expressing an interest, 42% of all meat purchasers) expressed a preference for a textual description while 33% (26% of the total) expressed a preference for a numeric code.

Stakeholders had mixed views on this topic, but the majority had a preference for a textual description to ensure that the information was actually communicated to consumers. This is also the preference expressed generally in the literature for the same reason. It was pointed out that the numeric code system used in the egg sector is relatively poorly understood and requires a textual explanation alongside in any case. An advantage of a numeric code approach is that the information would be there for those who want it, but would be less obvious to those who do not. A numeric code would also take up less space on a label and might reduce stigmatisation of those selecting meat from unstunned animals, but primarily because it would be less widely understood, which would undermine the point of having the information in the first place. It was noted that care would have to be taken in the choice of any wording used in order to ensure it is not pejorative.

Our conclusion is that, in accordance with the literature, consumers and stakeholders would prefer a non-pejorative textual explanation with wording which should have the same meaning across the EU.

Stakeholders pointed out that while introducing a label would be less complicated in the fresh meat sector (albeit not without impacts on the production chain, see below), it would be more complicated to introduce a label for further processed products and in the catering sector. However, stakeholders recognised that it is in the catering sector and amongst further processed products that any information gap exists and therefore the rationale for labelling means that these sectors should be included in any labelling requirement if this information gap is to be addressed. **Some stakeholders suggested that applying mandatory labelling in the retail sector while continuing to allow voluntary labelling in other sectors would be a workable compromise.**

Our conclusion is that mandatory labelling would be less complicated to introduce for fresh meat in the retail sector than for processed products or in the catering sector.

If a label were to be introduced, two options would be possible in terms of coverage (i) universal coverage, i.e. both meat from stunned and unstunned animals, or (ii) labelling of only one market segment, i.e. either stunned or unstunned. In the latter case, the general consensus amongst stakeholders was that the unstunned side of the market should be labelled as the smaller market segment and the exception to the norm. However, stakeholders recognised that this might be seen as stigmatising those selecting meat from unstunned animals and there was a desire to avoid this outcome. Stakeholders also made clear that almost all meat sold at retail will be from animals which have been stunned and that therefore this is the only label most consumers are likely to come into contact with; this calls into question the utility of a label when there is no purchase decision to make.

A universal approach to labelling would provide consistency and may help to reduce any possible stigmatisation. However, at the retail level, most consumers are unlikely to be confronted with a choice making a label somewhat redundant. A partial approach would provide consumers with sufficient information to make a choice and labelling the exception to the norm would be consistent with other labelling policy such as that applying to GM food. However, this approach carries a higher risk of stigmatising consumers of labelled meat.

Our conclusion is that labelling fresh meat from both stunned and unstunned animals would not provide consumers with more choice at retail level. Only labelling meat from unstunned animals would inform consumers who are specifically interested in this information. However such labelling would carry a high risk of stigmatising religious communities especially in the present political context and given the findings above that consumers have little understanding of the slaughter process.

S1.3.4. Costs of introducing labelling

There are two main categories of cost in common with those following the introduction of Country of Origin labelling: traceability costs (those associated with introducing the required mechanisms to keep individual products associated with a set of information through the supply chain) and operational costs (those associated with operating the system including communication to consumers). Many

costs associated with traceability requirements will already have been incurred for fresh meat from April 2015 and only additional costs beyond these are relevant here. Stakeholders did not think that any additional costs for fresh meat would be substantial. Should labelling be introduced for processed products, which are not already covered by Country of Origin labelling, costs would be incurred and could be potentially high, particularly in the event that method of stun was also indicated.

Labelling may induce changes to sourcing practices in Member States where the religious derogation is used and the creation of parallel supply chains will imply additional cost, especially in the religious markets where the overall value of carcasses is expected to reduce. Slaughterhouse economics rely on high throughputs and the need to move from continuous to batch processing to ensure identity preservation implies an increase in cost per unit of output. Stakeholders did not think compliance costs would be significant. Labelling and packaging costs are not considered to be significant.

Indirect costs as a result of changes in overall demand are, at this stage difficult to determine, but are expected to be short-term; these are likely to be more substantial if the method of stun is indicated. Any costs incurred would be passed on to consumers and this is expected to be more significant in the religious markets.

Our conclusion is that while introducing labelling would involve a cost, this would not be substantial for fresh meat, but would be potentially high for processed product³. Costs will increase with scope and if method of stun were to be indicated; implementation modalities are therefore important. Costs would fall disproportionately on the religious markets and on the industry and consumers in those Member States which operate the religious derogation.

S1.3.5. Willingness to pay for labelling

There is very little information on willingness to pay for this specific information and the evidence available, which uses stated preference techniques, is subject to the consumer paradox. This suggests that willingness to pay for most consumers is low, which matches the expectations of stakeholders. However, as borne out by the success of certain private labelling schemes, there is greater willingness to pay for more general higher animal welfare which can, and sometimes does, include requirements to not use the religious derogation.

Our conclusion is that there is low consumer willingness to pay for information on whether animals have been stunned prior to slaughter.

S1.3.6. Consequences of introducing mandatory labelling (other than costs)

It is clear that the modalities of any labelling scheme would have bearing on the consequences and that without knowing these modalities, only general conclusions are possible.

Stakeholders did not expect any long-term impact on the meat market if stunned/unstunned labelling were to be introduced, although a short-term impact while consumers became used to the new

³ In line with the terms of reference for this project, our cost analysis is based only on the consultation of representative organisations, and is therefore qualitative. A detailed cost analysis would require further research.

information could not be ruled out. A greater impact would be likely if the method of stun were to be included on the label as well.

Stakeholders all expect total supply of meat from unstunned animals to decrease in the event of a label being introduced in order to better match demand. However, it is possible that demand for unstunned meat within the Halal market may increase given the lack of agreement on whether pre-stunning is permitted.

Certain possible impacts on the meat supply chain were identified. There was some concern that introducing labelling would result in two meat supply chains with different values and that this would increase the risk of fraud. In this context it is noted that traceability systems would need to rely on paper-based systems with no ability to carry out checks on the product to determine whether the animal had been pre-stunned. This will only be an issue in Member States where the religious derogation is in use. It was noted that segmentation may adversely impact smaller operators through additional record keeping requirements at the retail end of the chain, and through a move towards purchasing from larger operators to avoid segmentation requirements which could limit the market opportunities for producers further up the chain.

Producers in Member States operating the derogation would be placed at a disadvantage vis-à-vis those in Member States not using the derogation and this may impact trade within the EU.

Although some stakeholders raised concerns about impact on external trade, the small size of the EU markets demanding meat from unstunned animals and the need for third countries to follow existing retailer supply codes means that substantial impacts on the EU market from trade with third countries are unlikely.

There would be some differential impact on exporters in individual Member States according to whether the derogation is in use.

Our conclusion is that the introduction of labelling to indicate whether an animal has been stunned or not would not have a long-term impact on demand. Should the method of stun be indicated, the impact would potentially be greater. A differential impact is expected according to whether the religious derogation is used with the industry in those Member States using the derogation placed at a disadvantage. These conclusions can only be general at this stage. Further work on impacts would be necessary based on more specific labelling modalities.

S1.3.7. Impacts on different groups

The main identified concern was that introducing labelling might result in the stigmatisation of those wishing to buy meat from unstunned animals. There is the potential for this issue to be conflated with the issue of religious slaughter and great care is needed to ensure that religious freedoms are respected. Although there is no concern that introducing labelling would reduce the availability of meat from unstunned animals for those that want it, it is possible that labelling would result in higher costs in this market segment if the value of carcasses and cuts which could not be utilised in these markets decreased. This may reduce the affordability of meat for Muslim and Jewish communities. However, without knowing the modalities of any labelling it is not possible to be more precise.

Our conclusion is that should labelling be introduced it will result in higher prices for religious groups which demand meat from unstunned animals. There will also be a risk that these religious groups become stigmatised.

S1.3.8. Existing information on the use of stunning

Stakeholders explained that there are quite a few voluntary schemes which allow consumers to be sure that meat is from animals which have not been slaughtered under the religious derogation, although the prevalence of these varies by Member State. Furthermore, in some Member States it is quite usual for retailers to insist that all their own label products are from animals which have been pre-stunned. There are also certification schemes which allow the identification of Kosher and Halal meat, although in the latter case this does not provide information on whether the animal was pre-stunned without reference to the certification standards. Stakeholders felt that it is therefore possible for motivated consumers to be sure that the fresh meat they buy at retail is from stunned animals in some Member States.

There are also some voluntary schemes which allow the motivated consumer to be sure that the meat in processed products is from stunned animals in the processed product sector, although this is far less common. Stakeholders agreed that the greatest potential information gap is in the wholesale and catering sector.

Our conclusion is that it is possible for consumers to select fresh meat from stunned animals in certain Member States. This is relatively straightforward in Member States which do not operate the religious derogation, as well as where relevant voluntary schemes are in place. In Member States which operate the derogation, but do not have voluntary schemes, it may be difficult for consumers to identify meat from stunned animals; this aspect deserves further research. There is a potential information gap across the EU for further processed products and in the catering sector.