

RITUAL SLAUGHTER ISSUE IN POLAND: Between Religious Freedom, Legal Order and Economic- political Interests

AGNIESZKA SZUMIGALSKA, *VU University Amsterdam*

MONIKA BAZAN. *University of Wrocław*

ABSTRACT: Ritual slaughter issues have been broadly discussed in virtually all West European countries, where Jewish and/or Islamic minorities have marked their presence. In most cases, the main dimension of the public debate on this matter has concerned the collision between broadly defined religious freedom and the principles of animal protection. Recently, the discussion on ritual slaughtering has also reached Poland, where it has taken a specific form in comparison with Western countries. The distinctive character of the Polish case may be proven, inter alia, by the marginal socio-political relevance of Jewish and Islamic minorities in Poland and focus on the political and economic aspects of the issue. In the presented analysis, the main stress has been placed on the interpretation of religious freedom in this regard, i.e. its conditions and constraints, the conditions of the implementation of European law and the arguments used in the debate. Religious communities' activities have been confronted with the political and economic aspects of the discussion, which are aimed at investigating the degree of the "politicisation" and "economisation" of the issues under scrutiny.

KEYWORDS: ritual slaughter, Islam, Muslims, Jews, Poland

INTRODUCTION

Ritual slaughter¹ issues have been broadly discussed in Western Europe. It appears that the emergence of this issue in public debate has been triggered by the presence and activity of Islamic communities, although this practice is also conducted by the followers of Judaism and has historically been present in Europe. However, the current debates can be placed in somewhat different socio-cultural and socio-political contexts determined by the increasing

¹ In this paper, the term "ritual slaughter" will be used with reference to the practice of slaughtering the animals with no stunning prior to the cut, as it is practised in accordance with Jewish and Islamic traditions. The use of the term will not be restricted to religious groups and will also be used with reference to meat producers who technically conduct such a method of slaughtering.

activity of non-Christian religious minorities in Western Europe (Muslims in particular). The presence of “non-Western” religious cultures after World War II has not only led to religious pluralisation of many Western societies, but it has also brought the new cultural “quality” which has entailed the rearrangement of social relations and political notions. Here, the attitude toward ritual slaughtering of animals plays a relevant role in the perception of Islamic and Jewish rights and freedoms (as well as their constraints).

In recent decades discussions concerning ritual slaughter issues have intensified, and the deep argumentative engagement and activity of both the adherents and opponents may be observed in many European countries (e.g. in the Netherlands – Szumigalska 2012, 202-203, and Great Britain - BBC 2014). Ritual slaughter with no stunning prior to the cut is forbidden in Switzerland (since 1893) (*Switzerland, International Religious Freedom Report* 2006), Norway (since 1929; the ban was preceded by a long debate initiated at the end of the nineteenth century) (Lunga 2013; Norwegian Animal Welfare Act 1974) and Sweden (since 1937) (Lunga 2013; *Sweden, International Religious Freedom Report* 2006; GAIN Report-SW5014 2005). Since February 2014 ritual slaughter has also been officially banned in Denmark (however, ritual slaughter had not in fact been practised long before the enactment of the law) (Ritual Slaughter in Denmark 2014; Lev 2014). To mention some examples from Central Europe, since September 2014 ritual slaughter has been legal in Lithuania (*Lithuanian parliament OKs ritual slaughter* 2014), while e.g. in Estonia ritual slaughter is legal under considerably restrictive conditions (*Estonia to change shechita law...* 2012). Outside Europe, ritual slaughter is illegal e.g. in New Zealand (since 2010) (Levine 2011).

Very recently the respective debate has taken place in Poland, with a very specific form in comparison with Western countries. Two main factors prove a distinctive character of the Polish case. First, contrary to many Western societies where the activity of Islamic communities forms the core of such debates, Islamic and Jewish minorities are of marginal socio-political (public) relevance in Poland.² For this reason, there arises a question regarding the character of their involvement in the debate, on the one hand, and their lobby potential on the other. Second, in the case of Poland the issue has been highly politicised in the public debate (with a special role played by the media), with particular focus on economic arguments. The arguments of religious freedom have been raised by religious communities and their representatives, but in fact the debate has been dominated by the representatives of particular economic interest groups (the meat industry), which may suggest an instrumental use of the notion of religious freedom.

The ritual slaughter issue may be investigated at least at three levels, i.e. with reference to religious traditions, ecological/ethical arguments, and economic (and political) interests. In this paper, the main focus has been put on the notion of religious freedom, which has, however, appeared in a somewhat new (politico-economic) context in Poland. Therefore, one of the main premises of this analysis is that religious freedom, if referred to, has not only been politicised, but also “economicised”. In discussions on ritual slaughter issues two main points of reference have been used, i.e. economic (peasants’ interests) and ecological/ethical (humane treatment of animals). The main research question which thereby arises concerns the relevance of the arguments of *religious freedom* in the debate and/or the extent of their instrumentalisation. The second question concerns the decisive actors in the debate, i.e.: Who played the crucial role in political arrangements concerning the regulations of ritual slaughter in Poland? What factors have determined the shape of this debate? The presented investigation

² According to the statistics from 2013, approximately 1300 persons are members of the Islamic Religious Community in Republic of Poland (Muzułmański Związek Religijny w RP) (Główny Urząd Statystyczny 2013, 139). However, according to Islamic communities, approximately 25-30000 Muslims live in Poland (including 5000 Polish Tatars) – data from http://www.muzulmanie.com/index.php?option=com_content&task=view&id=1060&Itemid=0. According to various statistics, the Jewish community makes up 8-12000 Jews.

has been based on the analysis of the legislation (both at the national and EU levels) and the politico-legislative debate on ritual slaughter issues in Poland. In this regard, the analysis has included legislative materials, *inter alia* the Council Regulation 1099/2009, national legal acts (including a bill draft), the adjudications and statements of Polish arms of law, i.e. the Constitutional Court and Public Prosecutor and legal interpretations, as well as other sources which allow for a broader analysis of the issues under scrutiny.

THE HISTORICAL BACKGROUND OF THE DEBATE

Considering relative religious homogeneity of Polish society,³ the ritual slaughter dilemma has appeared in a seemingly spontaneous manner, evoking deep emotions and leading to broad public debate. However, one should note that the respective discussion also took place in the inter-war period. The then discourse was directly connected with the period's political moods and attitudes toward Jews. A brief reflection on this period may help highlight the determinants and background of the current discussion, considering the deep change in socio-political conditions.

Jews made up nearly 10 per cent of Polish society in the inter-war period (Tomaszewski 1993, 159).⁴ Their position was determined by common socio-political resentment, as well as particular political solutions which hindered their activity. As an example one may refer to a ban on work on Sundays (which was aimed to limit Jews' economic activity) (Tomaszewski 1993, 184-185; Tomaszewski 1985, 102) and restrictions concerning Jews' access to higher education ("*numerus clausus*"), the stigmatisation of Jewish students (separate benches) (Tomaszewski 1993, 195-196; Natkowska 1999, 183), as well as boycotts of Jewish businesses and acts of violence against Jews (Kopstein 2010, 1110). Restrictions pertaining to ritual slaughter formed another factor influencing the position of Jews in Poland. One of the arguments raised in the inter-war debate on ritual slaughter was the high price of meat sold by Jews (which was caused by the high costs of professional butchers' services). This sharpened the course of the discourse and triggered political circles (the so-called *Sanatio*, Lat. *sanatio* – healing) who raised the arguments of the humane treatment of animals (Krajewski 2013).⁵ Under the pressure of public opinion, Jews agreed to reduce the price of slaughtering services. In this manner, however, economic aspects (which played a crucial role in the debate due to the difficult economic situation of Poland) intermingled with social factors (which were additionally influenced by the period's strong nationalist mood) and became subject to further politicisation. The new law of 1936 privileged Christian butchers with the use of the argument of the humane treatment of animals and as a result led to the loss of jobs by Jewish butchers (Chodakiewicz 2000, 67).

In 1936 the right to slaughter animals without prior stunning was considerably limited through the establishment of the new legal act. The main restriction concerned the condition that a minimum three per cent of a local population be made up of Jews, as was stipulated in

³ According to the CBOS poll from 2012, 93 per cent of Polish society declares their membership in the Catholic Church (CBOS BS/49/2012; see also Główny Urząd Statystyczny 2010).

⁴ Number of Jews in Poland in 1921 - 2 845,4 thousand (10,5 per cent), in 1931 - 3 113,9 thousand (9,8 per cent) in Tomaszewski 1993, 159.

⁵ This argument was influenced by the respective debates in Switzerland and Norway (a ban on ritual slaughter was introduced in these countries in 1892 and 1929, respectively).

the Act on the Slaughter of Farm Animals in Slaughterhouses of 17 April 1936.⁶ Interestingly, the stipulation concerning the legalisation of ritual slaughter was addressed to “those groups of population whose denomination required special practices which accompany the slaughter” (Art. 5). One may conclude that, on the one hand, the act was aimed to restrict the right to ritual slaughter among non-Catholic religious groups (i.e. Jews), but on the other hand, the act included all communities for whom ritual slaughter formed a religious or traditional requirement or practice. Although this regulation was not fully approved by the Parliament,⁷ the opposite opinions and postulates to liberalise the law did not lead to any legislative solutions due to the breakout of the World War II (Tomaszewski 1993, 195-196).

World War II irreversibly changed the structure of Polish society. About 2,9-3 million Polish Jews were victims of the Holocaust (which is particularly striking considering the pre-war population of 3,4 million Polish Jews (data from September 1939) (Tych 2004, 157). The post-war climate formed conditions for a further decrease in the Jewish population. As a result of post-war anti-Jewish incidents in Poland, with 1968 as a prime example (cf. Topolski 2001, 193-194; Stola 2000a, 8; Stola 2000b; Stola 2006), the number of Polish Jews significantly decreased. During 1968-1970, 55.6 thousand Jews emigrated from Poland, mostly to Israel (Stola 2000a, 3).

CONTEMPORARY LEGISLATION REGARDING RITUAL SLAUGHTER ISSUES

Regarding the place of ritual slaughter issues in the systems of law (both at the EU and national levels), one should consider legal guarantees and practical realisation of both animal protection and religious freedom. It appears that the potential for the collision of rights and freedoms emerges on the border between these two notions. European law leaves considerable space for an individual member state's interpretation of the provisions regarding ritual slaughter, and member states can introduce further restrictions concerning the practice of ritual slaughter under condition of meeting legal requirements.

Regulations concerning religious freedom in Poland

Religious freedom and anti-discrimination policy are guaranteed in Polish law. Article 6 of the Act on the Guarantees for the Freedom of Religion and Conscience of 17 May 1989 (“Ustawa z dnia 17 maja 1989 r. o gwarancjach wolności sumienia i wyznania”) clearly stipulates the principles of non-discrimination, freedom and equality for all citizens of Poland, regardless of their religious convictions, with particular focus on the right to participate “in religious activities and practices” (including ritual slaughter, as may be interpreted from the act). Religious freedom is also guaranteed by the 1997 Constitution of the Republic in Poland, which directly refers to this tenet in Art. 53.

⁶ The Act on the Slaughter of Farm Animals in Slaughterhouses of 17 April 1936, Journal of Laws 1936 no. 29 items 234-237 [Ustawa z dnia 17 kwietnia 1936 o uboju zwierząt gospodarskich w rzeźniach, Dz. U. 1936, Nr 29, poz. 234, 235, 236, 237], lost its validity no earlier than in 1997 when it was replaced by the Act on Combating Infectious Animal Diseases, Examination of Slaughter Animals and Meat, and Veterinary Inspection of 24 April 1997, Journal of Laws 1997 no. 60, item 369 [Ustawa z dnia 24 kwietnia 1997 r. o zwalczaniu chorób zakaźnych zwierząt, badaniu zwierząt rzeźnych i mięsa oraz o Inspekcji Weterynaryjnej, Dz. U. 1997, Nr 60, Poz. 369].

⁷ Here, one should refer e.g. to the statement of the then Minister of Agriculture and Agricultural Reforms, expressed in the course of the 1936 parliamentary debate on the potential ban on ritual slaughter. The Minister Juliusz Poniatowski referred to the traditional notion of Polish religious tolerance, which should be maintained, in the opinion of the Government (Zieliński 2012, 36-37).

Regulations concerning the position of Jewish and Islamic communities in Poland

The position of Jews in Poland is regulated by the Act on the State's Attitude toward Jewish Religious Communities in the Republic of Poland of 20 February 1997 (Ustawa z dnia 20 lutego 1997 r. o stosunku państwa do gmin wyznaniowych żydowskich w Rzeczypospolitej Polskiej). Ritual slaughter is directly referred to in Art. 9 which states that:

1. The organisation and conduct of public worship and religious practices are subject to Jewish communities in accordance with their internal regulations.

2. In order to realise the right to conduct ritual practices and activities connected with religious worship – Jewish communities take care of kosher food supplies, canteens and ritual baths, as well as ritual slaughtering.

The position of Muslims in Poland has been legally regulated in the Act on the State's Attitude toward the Muslim Religious Community in the Republic of Poland of 21 April 1936. The act does not refer to the ritual slaughter issue, which may be explained by the fact that this had already been defined in the separate act of 17 April 1936 (The Act on the Slaughter of Farm Animals in Slaughterhouses, Ustawa z dnia 17 kwietnia 1936 o uboju zwierząt gospodarskich w rzeźniach).

European law regarding ritual slaughter issues

European regulations of ritual slaughter are present both on the level of EU-law and the documents of the Council of Europe. The basic EU legal document concerning the freedom of religion (in a broad sense) is the Charter of Fundamental Rights of the European Union. Article 10 ("Freedom of thought, conscience and religion") states that:

1. Everyone has the right to freedom of thought, conscience and religion. This right includes freedom to change religion or belief and freedom, either alone or in community with others and in public or in private, to manifest religion or belief, in worship, teaching, practice and observance.

This article involves a range of elements of religious freedom and forms a kind of platform for further analyses and interpretations. With regard to ritual slaughter issues one should primarily note the relevance of the statement concerning the right to "practise" religion. The notion of freedom to manifest or practise one's religion is considerably broad and does not precisely define the practical dimension of the realisation of this right.

At the level of European legislation, ritual slaughter issues have also been separately considered. Here, two main factors have played a role. The first one is directly connected with the awareness of the need for special legislative protection of animals and their humane treatment. The second aspect concerns religious minorities' rights. Both arguments have been taken into account in the provisions of European law, i.e. the European Convention for the Protection of Animals for Slaughter (of the Council of Europe) of 10 May 1979 (hereafter the 1979 European Convention) and (at the EU-level) the Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing (hereafter Council Regulation (EC) No 1099/2009). The 1979 European Convention has been entirely devoted to issues concerning animal protection and general rules of slaughtering, which had to be preceded by stunning. The Council Regulation (EC) No 1099/2009 pays more attention to

religious slaughtering and leaves relatively free interpretation of its provisions at the national level. The Council Regulation (EC) No 1099/2009 in its preamble (18) states that:

Derogation from stunning in case of religious slaughter taking place in slaughterhouses was granted by Directive 93/119/EC. Since Community provisions applicable to religious slaughter have been transposed differently depending on national contexts and considering that national rules take into account dimensions that go beyond the purpose of this Regulation, it is important that derogation from stunning animals prior to slaughter should be maintained, leaving, however, a certain level of subsidiarity to each Member State. As a consequence, this Regulation respects the 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.

The aforementioned provision clearly refers to the principle of religious freedom, which is guaranteed in Art. 10 of the Charter of Fundamental Rights of the European Union (hereafter Charter of Fundamental Rights). The execution of this principle is further developed in Art. 4.4 of the Council Regulation (EC) No 1099/2009. This provision envisages an exception from the rule of stunning prior to the cut “in the case of animals subject to particular methods of slaughter prescribed by religious rites (...) provided that the slaughter takes place in a slaughterhouse”. Moreover, the Council Regulation (EC) No 1099/2009 repeats the rule of subsidiarity (18).

Polish law regarding ritual slaughter issues

Compared to the inter-war period, the discussion concerning ritual slaughter in Poland has reappeared under different socio-political circumstances. The EU’s legislation regarding the freedom of religion and anti-discrimination policy have played a role in the debate. Polish law on religious freedom, as presented above, conforms to European standards.

In some respects, religious freedom may collide with the principle of animal protection, forming a range of opportunities for legal interpretation. In the analysis of the Polish case one should consider regulations pertaining not only to religious freedom but also animal protection, as well as legal conditions of killing animals. In Poland, a range of initiatives in this regard has been undertaken at the legislative level. Among the relevant regulations regarding ritual slaughter, one should stress the Act on the Protection of Animals of 21 August 1997 (Ustawa z dnia 21 sierpnia 1997 r. o ochronie zwierząt) and the Ordinance of the Minister of Agriculture of 9 September 2004 (Rozporządzenie Ministra Rolnictwa i Rozwoju Wsi z dnia 9 września 2004 r. w sprawie kwalifikacji osób uprawnionych do zawodowego uboju oraz warunków i metod uboju i uśmiercania zwierząt), Art. 8.

The stunning of an animal prior to slaughter was defined as compulsory in the Act of 21 August 1997. The Act envisaged an exception in this regard in the case of religiously motivated slaughter. This provision was nevertheless deleted by the amendment of 6 June 2002 (Ustawa z dnia 6 czerwca 2002 o zmianie ustawy o ochronie zwierząt), which banned and penalised slaughter without stunning. Interestingly, Ewa Łętowska suggests that this ban was in fact triggered by the lobby activity of the Polish meat industry – meat producers argued that ritual slaughter was not possible in practice due to the lack of professional slaughterhouses (Łętowska 2012). The ban on ritual slaughter was amended on 9 September 2004 on the basis of the Ordinance of the Minister of Agriculture. According to Article 8, the requirement of stunning prior to the cut was not applied in the case of ritual slaughter. It should be noted that the provision did not include any detailed regulations concerning the practical or technical conditions of slaughtering. This ordinance cast certain doubts concerning its conformity with the Act on the Protection of Animals and, thereby, the Constitution of the Republic of Poland.

For this reason, the case became subject to the Constitutional Court in Poland for further examination. On 24 April 2009, the Act on the Protection of Animals was amended (The Amendment to the Act on the Protection of Animals of 24 April 2009, Ustawa z 24 kwietnia 2009 r. o zmianie ustawy o ochronie zwierząt), but the amendment did not introduce any changes nor facilities regarding ritual slaughter (the amendment did not refer to the ritual slaughter issue). In this manner the legislative chaos (or rather the perplexities caused by the actual implementation of law) was sustained.

On 27 November 2012, at the request of the Public Prosecutor, the legality of the ritual slaughter issue in Poland was subject to the Constitutional Court (hereafter Court). The Court adjudicated (U 4/12) that Article 8.2 of the Ministerial Ordinance of 9 August 2004 conformed neither with the Act on the Protection of Animals (Art. 34.1 and 34.6) nor with the Constitution of the Republic of Poland (Art. 92.1). The central issue under scrutiny was the hierarchy of legal acts. According to the Court, Article 8.2. of the Ordinance infringed the provisions of both aforementioned legal acts of higher rank. In the final adjudication, the Court did not refer to the potential constitutional opportunity to permit ritual slaughter. In this manner, the dilemmas concerning the clash between the principles of religious freedom and humane treatment of animals, as well as the conditions of slaughter, have not been taken into consideration. On this legal basis, on 1 January 2013, the Ordinance lost its legal validity and the issue again became subject to the regulations of 1997 (as amended). Thereby, Polish law forbade slaughter without stunning. Two days before the re-enactment of the 1997 law, the Government informed the European Commission about the legislative situation in Poland by issuing a notification. The notification was required as on 1 January 2013, the Council Regulation (EC) No 1099/2009 was to be introduced.

The Council Regulation (EC) No 1099/2009 came into force in Poland on 1 January 2013. The same day the Ordinance of the Minister of Agriculture on 9 September 2004 lost its legal validity, which contributed to the legislative chaos. Besides this, the coincidence of these two legal developments considerably contributed to the shape of public debate and accelerated the respective legal developments concerning ritual slaughter issues. The situation in 2013 was different from the legal developments of 2002 due to Poland's accession to the European Union (in 2004) and, as a result, the process of the implementation of EU regulations. Moreover, simultaneous debates in other European countries (and their different results) should also be taken into account as a factor contributing to the shape of socio-political discussion in Poland (e.g. increasing social, political and media interest in the issue).

The shape of the political debate on ritual slaughter in Poland

In the course of the politico-legal debate, some controversies were cast by the relation (i.e. collision) between national and EU regulations. After the adjudication of the Court, a number of judicial opinions were prepared at the request of both religious communities and representatives of the meat industry. In legal interpretations which have been published on the website of the Islamic Society in Poland, the main arguments proving the non-conformity (and thereby, non-validity) of the regulations pertained to the legal conditions of the introduction of more restrictive policies by member states⁸ (e.g. required implementing regulations and the questioned legal sufficiency of the notification). From a legal point of view, EU regulations are to be directly applied by member states. Hence it appears that one of the crucial perplexities

⁸ Here, one should refer to paragraph (57) of the Convention, which leaves space to member states with regard to the conditions of slaughtering animals (not merely with regard to ritual slaughter):

European citizens expect a minimum of welfare rules to be respected during the slaughter of animals. In certain areas, attitudes towards animals also depend on national perceptions, and there is a demand in some Member States to maintain or adopt more extensive animal welfare rules than those agreed upon at Community level. In the interest of the animals and provided that it does not affect the functioning of the internal market, it is appropriate to allow Member States certain flexibility to maintain or, in certain specific fields, adopt more extensive national rules.

is the requirement of national regulations which would directly refer to the implementation of EU law and which could alternatively introduce further restrictions (e.g. non-application of Art. 4.4. of the Council Regulation 1099/2009) (Banaszak 2013; Orłowski 2013; Patyra 2013; Młynarska-Sobaczewska 2013; Szmulik 2013; Chmaj 2013).

The restrictions concerning the right to ritual slaughter evoked reactions in Islamic and Jewish circles. As one of the crucial issues, non-conformity with the ban with both Polish and international law has been stressed by both communities. In March 2013, mufti Miśkiewicz expressed his concern that the established ban involves the choice between the maintenance of religious tradition and obedience to Polish law (he also declared he would conduct ritual slaughter for the Islamic holiday Kurban Bayram although it was against the law) (*Oświadczenie Muftiego Tomasza Miśkiewicza...* 2013). The Association of Religious Jewish Communities in the Republic of Poland (Związek Gmin Wyznaniowych Żydowskich w Rzeczypospolitej Polskiej, hereafter Association of Jewish Communities) and Rabbi Schudrich released a statement with a negative evaluation of the decision of the Polish Government. The ban has been referred to in terms of “discrimination” and “hypocrisy of Polish authorities” (*Oświadczenie z 12 lipca 2013 po głosowaniu o dopuszczalności uboju rytualnego* 2013). In the statements of both Islamic and Jewish communities religious arguments (religious obligation and tradition) have been referred to, and they have been placed within a legal perspective, i.e. with regard to the existing guarantees of religious freedom and non-discrimination policy. Here, issues concerning the humane treatment of animals have also been raised, primarily by Jewish associations, who stressed that the traditional method of ritual slaughter is humane and does not cause additional pain. To support their arguments, the representatives of Jewish communities in Poland referred to the results of scientific research (cf. *Oświadczenie w sprawie uboju rytualnego* 2012). Interestingly, the Catholic Church in Poland has officially supported the right of Jewish and Islamic communities to practise ritual slaughter in accordance with their religious traditions (*Oświadczenie Prezydium KEP* 2013).

It appears that, despite the involvement of both Islamic and Jewish representatives in the public debate and their attempts to actively participate in the process of consultancy, the discourse has been nevertheless monopolised by the representatives of the Polish meat industry. These groups have become the most active and audible participants in the debate due to their considerable number and political potential. The enacted restrictions concerning the right to ritually slaughter animals with no stunning prior to the cut influenced the economic position of those slaughterhouses in Poland which specialised in ritual slaughtering methods.

In this political climate, on 10 May 2013, the Government put forward a draft bill (no. 1370) which was aimed to legalise (religiously motivated) ritual slaughter. Here, the Polish legislator introduced relatively strict regulations concerning the conditions of ritual slaughter (e.g. the ban on rotating cages), which was aimed at better protection of animals during the process of slaughtering and thereby, as one may conclude, at the mitigation of negative attitudes toward the practice of ritual slaughter. The amendment proposed in the draft bill involved stricter regulations than the respective European laws but simultaneously permitted ritual slaughter without stunning prior to the cut. It should be stressed that the establishment of legal conditions for ritual slaughter in Poland, as defined in the Government’s official draft bill, was argued mainly by economic aspects – this argumentation was extensively presented in the draft, moving religious arguments to the background. The document also stressed the fact that ritual slaughter has been legalised in many European countries.

According to the Government’s data, in 2011, cattle and poultry were slaughtered in the manner conforming to ritual slaughter practices in 15 and 12 slaughterhouses, respectively. As

stated in the draft bill, Polish beef has been primarily produced for export (Draft bill no. 1370).⁹ Thirty per cent of the total value of export of beef and 10 per cent of poultry come from ritual slaughter (Draft bill no. 1370). Moreover, owing to the decrease in the average consumption of beef in the EU (by two per cent), third countries have become a significant market for Polish meat (mainly from ritual slaughter). The potential loss of this market would considerably weaken the position of many slaughterhouses in Poland (Draft bill no. 1370).

The draft was written and supported by the Government (i.e. the coalition between the Civic Platform, Platforma Obywatelska, hereafter PO, and the Polish Peasants' Party, Polskie Stronnictwo Ludowe, hereafter PSL). The composition of the cabinet played a crucial role in the creation of the draft bill. Here, economic (i.e. the interests of the representatives of the meat industry) and political aspects (i.e. the strengthening of the coalition) became the decisive factors in the arranged alliance. In the course of public consultancy, the draft bill was positively evaluated by the representatives of Jewish and Islamic communities, as well as the organisations representing the meat industry. Nevertheless, all ecological organisations which were involved in the consultancy expressed their negative position toward the regulations included in this proposal. On 12 July 2013, the draft bill was subject to parliamentary voting which resulted in its withdrawal. Although the draft was written and supported by the Government partners, 38 deputies of the PO voted for its withdrawal, thereby contributing to the final decision. All deputies of the PSL voted for the proposed amendments (Voting no. 77, Parliamentary Gathering no. 45, 12 July 2013). The withdrawal of the amendment resulted in the legal restoration of the Law of 2002, which banned ritual slaughter without the stunning of an animal.¹⁰ The main arguments raised by the adherents of the law (i.e. the PSL and part of the PO) were of an economic character. In addition, at the parliamentary level this dimension of debate came to the fore as a prime argument. It appears that this factor has triggered opposition to the law – the opponents of the draft expressed their concerns regarding the jeopardised principle of the humane treatment of animals and referred to ethics and their individual consciences (cf. *Ubój rytualny- część posłów...* 2013; *Sejm nie zgodził się na ubój rytualny...* 2013).¹¹ The draft revealed the cabinet's interest-oriented policy, and the compromise appeared difficult to reach (which also resulted in, and revealed the emergence of an internal opposition within the PO).

On 17 March 2014, the Public Prosecutor of Poland released an official statement at the request of the Association of Religious Jewish Communities on 30 August 2013. The main reservation presented by the Association pertained to the non-conformity of the ban on ritual slaughter with the Constitution of the Republic of Poland, i.e. its constitutional guarantees of religious freedom (Art. 53.1, 53.2, 53.5), the maintenance of culture by national and ethnic minorities (Art. 35.1) and the principles of equality and non-discrimination (Art. 32.1, 32.2) (Stanowisko Prokuratora Generalnego 2014). In his statement, the Public Prosecutor repeated the interpretation of the Court regarding the hierarchy of legal acts in the Polish system of law, i.e. the Minister of Agriculture was not competent to enact the ordinance on 9 September 2004. Moreover, as was emphasised in the statement, the character of the debate involved the consideration of legal regulations concerning the freedom of religion and non-discrimination policy. However, the right to ritual slaughter needs to conform to Polish law, which does not

⁹ The consumption of beef in Poland is far lower than in other European countries and is 2 kg per capita in comparison to the average of 15 kg in the EU.

¹⁰ Interestingly, the EJA (European Jewish Association) and the Islamic Society in Poland (represented by Chief Mufti Tomasz Miśkiewicz), delivered their complaint to the European Commission over the ban on ritual slaughter (*Jews and Muslims cooperate...*, 2013). However, the Polish Chief Rabbi Michael Schudrich did not support this step, claiming that first, the Constitutional Court in Poland should be addressed in this regard (and not the European Commission), and second, that this step had not been discussed with the Polish Jewish Association. This tension sheds additional light on the complex character of the dialogue between religious representatives and different visions of the debate with the Government (Cf. *Ubój niezgodny*, 2013).

¹¹ In this regard see the Jewish Association's response to the arguments used by the opponents of the draft bill (*Oświadczenia w sprawie uboju rytualnego*, 2013).

allow for slaughter without stunning.¹² Interestingly, the aforementioned statement includes the interpretation of ritual slaughter in terms of Art. 2.9 and Art. 19.2 (9) of the Act on the Guarantees for the Freedom of Religion and Conscience. In the presented interpretation, an animal could not be defined as an “object” of religious practice. As further defined in the statement, (religious) moral issues are subject to evolutionary developments, e.g. polygamy or animal sacrifice have been abandoned in many religious traditions, and the same might be applied in the case of ritual slaughter considering the standards of the humane treatment of animals. Besides this, the Public Prosecutor referred to the economic aspect of ritual slaughter, thereby undermining the exclusively religious dimension of the issue. Hence, according to the statement, legal regulations concerning religious freedom in Poland cannot form the legal point of reference for the interpretation of ritual slaughter in terms of religious practice when it is aimed at export and gaining economic profit (*Stanowisko Prokuratora Generalnego* 2014).

Here, two comments are worth particular attention. First, the principle of religious freedom is regularly used as an argument in cases where religious communities and individuals are involved. The reference to this tenet in a situation where the very issue primarily concerns the meat industry and economic aspects is controversial as the debate in Poland has considerably surpassed the field of religious arguments. The second comment refers to the principle of state neutrality, which can to a certain extent be undermined by the Public Prosecutor’s interpretation of strictly religious practices and their justification. It appears that the definition of the accepted forms of religious practices (here, with regard to ritual slaughter) obscures the pure legal adjudication of the existing legal situation. The reference to such an interpretation, which has been present in the statements expressed by ethical associations and representatives of Polish science and culture, may appear controversial in the case of state official legal representatives, such as the Public Prosecutor.

In October 2014 the Polish Ombudsman for Civil Rights (hereafter Ombudsman) Irena Lipowicz issued an official statement declaring that the ban on ritual slaughter does not conform to the Polish Constitution, the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union (*Wniosek Rzecznika Praw Obywatelskich* 2014). The Ombudsman’s reservations concern the ban on ritual slaughter with regard to Islamic and Jewish communities, which, in the Ombudsman’s opinion, undermines the principle of religious freedom. The application for further investigation and adjudication has also been submitted by the Association of Religious Jewish Communities in the Republic of Poland. The issue will be adjudicated by the Constitutional Court in December 2014 (*Trybunał zbada sprawę uboju rytualnego* 2014).

CONCLUSIONS: BETWEEN LEGAL ORDER AND POLITICAL INTERESTS

Recent debates on ritual slaughter in Poland have revealed a complex and multidimensional character of the issue, leading to a range of controversies and ambiguities and involving a number of participants. The issue has been widely discussed in public, has engaged socio-political groups and media and has contributed to a deepening polarisation of society which

¹² The internal diversity of Jewish (and Islamic) communities was also stressed in the statement of the Publish Prosecutor, as an obstacle to the coherent legislation that would equally refer to all the respective communities.

has manifested through demonstrations, protests and petitions¹³ by both the opponents and supporters of ritual slaughter in Poland. The decisive moment in this regard is the period from 2012 to 2013 when politico-legal developments and motives led to broad public debate. When comparing this debate with the pre-war period, one may note that the role of religious communities (Jewish communities in particular) has changed both due to the change in the number of Jews and the period's socio-political moods. In the contemporary debate in Poland the main stress has been moved to the politico-economic dimension.

In the Polish case the interest groups of the meat industry have become the decisive participants, while religious groups have been considerably less visible. Although the strength and audibility of the meat producers is striking in the context of the (seemingly) religious background of the debate, one may note that in this manner the interests of Islamic and Jewish communities have found their representatives. In fact, however, economic interests and arguments have considerably blurred the religious dimension of the debate and have contributed to the ascription of the negative aspects of the issue (i.e. cruelty to animals) to Jewish and Muslim communities. The main goal of these religious communities has been the achievement of the right to practise their religious obligations and traditions. However, the lobby activity of the meat industry and the scale of ritual slaughter in Poland have led to the politicisation and economisation of the issue, which have additionally sharpened the debate.

In the Polish case, religious argumentation has lost its credibility in the course of the debate, which may be well illustrated by the Public Prosecutor's interpretation. The economic arguments (i.e. Poland's foreign economic policy) have played the decisive role and, although both Jewish and Muslim representatives have actively participated in the debate, the discourse has been monopolised by the meat producers. Religious communities, despite their activity in this debate, have not had an equal chance to present their views. Among the main factors in this regard one may mention the communities' capabilities, i.e. limited access to the media and political players. This may be proven by the shape of the debate at the parliamentary level. Religious argumentation has been suppressed by economic interests, and legal principles of religious freedom have not become the major argument.

The position taken by the meat producers and their lobby strategy (e.g. regarding the legislative developments in 2002 – see Łętowska 2012) reveal their *political* potential. This is particularly noticeable when compared to the religious communities' and ecological/ethical organisations' potential. The main (political) channel of the articulation of meat producers' interests, that is the PSL, may shed some light on their strength and audibility. As a pivotal

¹³ In the course of the debate numerous petitions (representing both approaches) have been published, spread and signed, e.g. the Polish Ethics Association [Polskie Towarzystwo Etyczne, PTE] in their petition of 7 December 2012 (the same petition was also signed by the representatives of Polish culture and animal welfare organisations), stressed, *inter alia*, the negative perception of "the bloody practices" of ritual slaughter, which in the PTE's opinion, would evoke negative attitudes towards Jewish and Islamic communities. The PTE's petition, available at <http://www.obrona-zwierzat.pl/images/stories/interwencje/rytualny/pte.pdf> [Date of retrieval: 23 May 2014]; the petition of Polish scientists against the legalization of ritual slaughter (of 8 December 2012), available at <http://www.obrona-zwierzat.pl/images/stories/interwencje/rytualny/naukowcy2.pdf> [Date of retrieval: 23 May 2014]; the representatives of Polish meat industry ("Polish Meat" society in particular) also submitted their petition (on 21 March 2013) for the legalization of ritual slaughter, in which they stressed the economic aspects; the petition is available at <http://www.ppr.pl/artykul-w-sprawie-przywrocenia-uboju-rytualnego-175318.php> [Date of retrieval: 23 May 2014], and the recent petition which has taken the form of the citizens' initiative after collecting the required number of over 100 thousand signatures at the beginning of 2014 by the National Council of Agricultural Chambers [Krajowa Rada Izb Rolniczych, KRIR]. Moreover, according to the sociological surveys conducted in 2013, 65 per cent of respondents declared that ritual slaughter should not be permitted in Poland (in this group, 87 per cent of the opponents of the legalization of ritual slaughter in Poland argued that this practice would cause too much pain and suffering of animals). Interestingly, however, this percentage was considerably higher (82 per cent) when the question concerned the legalization of ritual slaughter only for the use of religious communities. CBOS, BS/70/2013, available at http://www.cbos.pl/SPISKOM.POL/2013/K_070_13.PDF [Date of retrieval: 15 July 2014].

party, the PSL plays a relevant role in coalition negotiations and governmental policy. Hence, through the natural representation of the meat industry, the PSL has become the channel of their lobby activity. Although on the side of the opponents of the legalisation of ritual slaughter comparable determination could be observed, their political influence and audibility were much weaker¹⁴ than the political potential of the meat industry representatives.

The notion of the humane treatment of animals has become the most controversial issue in the debate on ritual slaughter in Poland, forming the foundation of deep socio-political polarisation. Religious motivation was barely audible in the discourse. However, the debate has mobilised the representatives of the Polish meat industry, who have received strong support from the PSL at the parliamentary level. The religious (Islamic and Jewish) communities have never been supported to such an extent. Hence, one may conclude that on the one hand, the activity of the meat producers has had the potential to generate particular solutions; on the other hand, however, the economisation of the issue has led to strong social and political opposition. The debate has also revealed perplexities regarding the balance between rights and freedoms, as well as the difficulties faced by religious minorities in the relatively homogeneous Polish society. Moreover, new political (to a large extent "coincidental") alliances between political parties (opponents of the legalisation of ritual slaughter) have been formed at the parliamentary level. It appears that the political developments and legal interpretations have not yet brought end to the debate. On the contrary, one may assume subsequent steps to be taken in this field and further politico-legal discussion, particularly when considering the need for final regulation of the issue.

On 10 December 2014 (after the acceptance of this article), the Constitutional Tribunal adjudicated that the ban on ritual slaughter in Poland does not conform to the Polish Constitution (K 52/13).

REFERENCES

- BANASZAK, Bogusław. 2013. *Opinia prawna w sprawie dopuszczalności dokonywania w Polsce tzw. uboju rytualnego po dniu 1 stycznia 2013 r.* http://mzr.pl/pl/pliki/Opinia_prof._dr_hab._Boguslaw_Banaszak.pdf. (Date of retrieval: 24 May 2014).
- Centrum Badania Opinii Społecznej, BS/70/2013. http://www.cbos.pl/SPISKOM.POL/2013/K_070_13.PDF. (Date of retrieval: 11 October 2014).
- Centrum Badania Opinii Społecznej. BS/49/2012. http://cbos.pl/SPISKOM.POL/2012/K_049_12.PDF. (Date of retrieval: 11 October 2014).
- CHMAJ, Marek. 2013. *Opinia prawna w przedmiocie dopuszczalności dokonywania tzw. uboju rytualnego na terytorium Rzeczypospolitej Polskiej w świetle obowiązującego prawa.* http://mzr.pl/pl/pliki/Opinia_prof._dr_hab._Marek_Chmaj.pdf. (Date of retrieval: 24 May 2014).
- CHODAKIEWICZ, Marek Jan. 2000. *Żydzi i Polacy 1918-1955. Współistnienie-Zagłada-Komunizm*, Warszawa: Biblioteka Frondy.
- Estonia to change shechita law based on 'new scientific knowledge'*. European Jewish Congress, 7 August 2012 <http://www.eurojewcong.org/protecting-jewish-life-traditions/8101-estonia->

¹⁴ For example, as stressed by Ewa Łętowska, the protests of the opponents of ritual slaughter after the establishment of the act in 2002, were barely audible or referred to by the policy-makers.

- to-change-shechita-law-based-on-%E2%80%98new-scientific-knowledge%E2%80%99.html. (Date of retrieval: 16 November 2014).
- GAIN Report-SW5014. "Sweden, Livestock and Products, Animal Welfare Legislation in Sweden 2005. Slaughtering of Farm Animals". <http://apps.fas.usda.gov/gainfiles/200510/146131334.pdf>. (Date of retrieval: 14 April 2014).
- Główny Urząd Statystyczny. 2013. *Mały Rocznik Statystyczny*. http://www.stat.gov.pl/cps/rde/xbcr/gus/RS_maly_rocznik_statystyczny_2013.pdf. (Date of retrieval: 14 April 2014)
- Główny Urząd Statystyczny. 2010. *Wyznania religijne. Stowarzyszenia narodowościowe i etniczne w Polsce 2006-2008*. http://www.stat.gov.pl/cps/rde/xbcr/gus/oz_wyzn_rel_stow_nar_i_etn_w_pol_2006-2008.pdf. (Date of retrieval: 14 April 2014).
- Oświadczenie w sprawie uboju rytualnego*. 2012. Gmina Wyznaniowa Żydowska w Warszawie [Jewish Religious Community in Warsaw], 22 November. Warsaw. http://warszawa.jewish.org.pl/images/Dokumenty/szechita_oswiadczenie_gminy_zydowskiej_22112012.doc. (Date of retrieval: 10 November 2014).
- Jews and Muslims cooperate in bringing official complaint to EU against Polish ban on ritual slaughter*. Press communiqué. 1 December 2013. European Jewish Association. <http://www.ejassociation.eu/70484.html>. (Date of retrieval: 24 May 2014).
- KOPSTEIN, Jeffrey S., and Jason Wittenberg. 2010. "Beyond Dictatorship and Democracy: Rethinking National Minority Inclusion and Regime Type in Interwar Eastern Europe". *Comparative Political Studies* 43: 1089–1118.
- KRAJEWSKI, Andrzej. 2013. "Przedwojenne spory o ubój rytualny. Mięso polityczne". *Polityka*, 8 January.
- LEV, David. 2014. "Joining Bandwagon, Denmark Bans Kosher Slaughter". *Arutz Sheva*7, 13 February. <http://www.israelnationalnews.com/News/News.aspx/177447>. (Date of retrieval: 14 April 2014).
- LEVINE, Hal. 2011. "New Zealand's ban on kosher slaughtering". *Ethnology* 50: 209–222.
- Lithuanian parliament OKs ritual slaughter*, Jewish Telegraphic Agency, 23 September 2014 www.jta.org/2014/09/23/news-opinion/world/lithuanian-parliament-oks-ritual-slaughter. (Date of retrieval: 16 November 2014)
- LUNGA, Audun. 2013. "Butchery law with anti-Semitic roots". 6 November. <http://sciencenordic.com/butchery-law-anti-semitic-roots>. (Date of retrieval: 14 July 2014).
- "Łętowska: Cała prawda o uboju rytualnym". 2012. *Krytyka Polityczna*, 11 December. <http://www.krytykapolityczna.pl/artykuly/opinie/20121211/letowska-cala-prawda-o-polskim-uboju-rytualnym>. (Date of retrieval: 7 May 2014).
- MEYNARSKA-SOBACZEWSKA, Anna. 2013. http://mzr.pl/pl/pliki/Opinia_prof_nadzw_dr_hab_Annamlynarska-Sobaczewska.pdf. (Date of retrieval: 24 May 2014).
- NATKOWSKA, Monika. 1999. *Numerus clausus, getto ławkowe, numerus Nulli, „paragraf aryjski”. Antysemityzm na uniwersytecie warszawskim 1931-1939*, Żydowski Instytut Historyczny IN-B. Warszawa.

- ORŁOWSKI, Wojciech. 2013. *Opinia prawna w przedmiocie "Dopuszczalności uboju rytualnego na terytorium Rzeczypospolitej Polskiej na podstawie obowiązujących przepisów prawa."* http://mzr.pl/pl/pliki/Opinia_prof._Wojciech_Orlowski.pdf. (Date of retrieval: 24 May 2014).
- Oświadczenia w sprawie uboju rytualnego*, July 15, 2013. <http://warszawa.jewish.org.pl/pl/aktualnosci/474-oswiadczenia>. (Date of retrieval: 15 November 2014).
- Oświadczenie Prezydium KEP*, 25 September 2013. http://episkopat.pl/dokumenty/pozostale/5350.1,Oswiadczenie_Prezydium_KEP.html. (Date of retrieval: 17 November 2014).
- Oświadczenie Muftiego Tomasza Miśkiewicza, przewodniczącego Najwyższego Kolegium Muzułmańskiego Związku Religijnego w Rzeczypospolitej Polskiej w sprawie obchodów 15 października br. Kurban Bajramu, muzułmańskiego Święta Ofiarowania (Id al-Adha)*. 11 October 2013. http://www.mzr.pl/pl/pliki/oswiadczenie_mufti.pdf. (Date of retrieval: 15 November 2014).
- Oświadczenie z 12 lipca 2013 po głosowaniu o dopuszczalności uboju rytualnego*. Związek Gmin Wyznaniowych Żydowskich w RP [Association of Religious Jewish Communities in the Republic of Poland]. 12 July 2013. <http://warszawa.jewish.org.pl/pl/aktualnosci/474-oswiadczenia>. (Date of retrieval: 15 November 2014).
- PATYRA, Sławomir. 2013. *Opinia prawna w przedmiocie dopuszczalności dokonywania w Polsce tzw. uboju rytualnego, w świetle obowiązującego po dniu 1 stycznia 2013 r. stanu prawnego*. http://mzr.pl/pl/pliki/Opinia_prof._nadm._dr_hab._Slawomir_Patyra.pdf. (Date of retrieval: 24 May 2014).
- Petition of Polish scientists against the legalization of ritual slaughter*. 8 December 2012. <http://www.obrona-zwierzat.pl/images/stories/interwencje/rytualny/naukowcy2.pdf>. (Date of retrieval: 23 May 2014).
- Petition of the representatives of meat industry*. 21 March 2013. <http://www.ppr.pl/artikul-w-sprawie-przywrocenia-uboju-rytualnego-175318.php>. (Date of retrieval: 23 May 2014).
- Polskie Towarzystwo Etyczne [Polish Ethics Association]. *Oświadczenie*. 2012. <http://www.obrona-zwierzat.pl/images/stories/interwencje/rytualny/pte.pdf>. (Date of retrieval: 21 May 2014)
- Pyclik Krzysztof. 2013. *Kwestia uboju rytualnego w świetle Deklaracji ONZ o wyeliminowaniu wszelkich form nietolerancji i dyskryminacji z powodu religii lub przekonań, Europejskiej konwencji o ochronie zwierząt przeznaczonych do uboju oraz Konwencji UNESCO w sprawie ochrony niematerialnego dziedzictwa kulturowego*. http://www.mzr.pl/pl/pliki/Kwestia_uboju_rytualnego_w_swietle_Deklaracji_ONZ.pdf (Date of retrieval: 24 May 2014).
- Religious animal slaughter change urged*. BBC News. 6 March 2014. <http://www.bbc.com/news/uk-26463064>. (Date of retrieval: 15 June 2014).
- Ritual Slaughter in Denmark*. Press Release of the Ministry of Food, Agriculture and Fisheries of Denmark. 26 February 2014. <http://en.fvm.dk/news/news/nyhed/ritual-slaughter-in-denmark/>. (Date of retrieval: 14 April 2014).
- Sejm nie zgodził się na ubój rytualny w Polsce. Zobacz, kto jak głosował*, 12 July 2013 http://wyborcza.pl/1,76842,14266395,Sejm_nie_zgodzil_sie_na_uboju_rytualny_w_Polsce__Zobacz_.html. (Date of retrieval: 16 November 2014)

- STOŁA, Dariusz. 2000a. "Emigracja pomarcowa". *Prace Migracyjne* 34. Instytut Studiów Społecznych UW. www.migracje.uw.edu.pl/download/publikacja/459/. (Date of retrieval: 12 April 2014).
- STOŁA, Dariusz. 2000b. *Kampania syjonistyczna w Polsce 1967-1968*. Instytut Studiów Politycznych Polskiej Akademii Nauk. Warszawa.
- STOŁA, Dariusz. 2006. "Anti-Zionism as a Multipurpose Policy Instrument: The Anti-Zionist Campaign in Poland 1967-1968". *The Journal of Israeli History* 25 (1): 175–201.
- Sweden, International Religious Freedom Report*. Bureau of Democracy, Human Rights, and Labor. 2006. <http://www.state.gov/j/drl/rls/irf/2006/71410.htm>. (Date of retrieval: 14 April 2014).
- Switzerland, International Religious Freedom Report*. Bureau of Democracy, Human Rights, and Labor. 2006. <http://www.state.gov/j/drl/rls/irf/2006/71411.htm>. (Date of retrieval: 4 April 2014).
- SZMULIK, Bogumił. 2013. *Opinia prawna w przedmiocie dopuszczalności uboju rytualnego na podstawie obowiązujących przepisów prawa*. http://mzr.pl/pl/pliki/Opinia_prof._dr_hab._Bogumil_Szumilik.pdf. (Date of retrieval: 24 May 2014).
- SZUMIGALSKA, Agnieszka. 2012. *The State's Attitude towards Churches in the Netherlands after World War II*. PhD Dissertation. University of Wrocław. Wrocław.
- TOMASZEWSKI, Jerzy. 1985. *Ojczyzna nie tylko dla Polaków. Mniejszości narodowe w Polsce w latach 1918-1939*. Warszawa.
- TOMASZEWSKI, Jerzy. 1993. *Najnowsze dzieje Żydów w Polsce w zarysie (do 1950 roku)*. Warszawa: Wydawnictwo Naukowe PWN.
- TOPOLSKI, Jerzy. 2001. *Polska w XX wieku*. Poznań: Wyd. Poznańskie.
- „Trybunał zbada sprawę uboju rytualnego”. 2014. <http://www.jewish.org.pl/index.php/pl/sposecznopydowska-w-polsce-mainmenu-59/6649-trybuna-zbada-spraw-uboju-religijnego.html>. (Date of retrieval: 11 November 2014).
- TYCH, Feliks. 2004. *Postawy społeczeństwa polskiego wobec zagłady jego żydowskich współobywateli, w: Pamięć; historia Żydów polskich przed, w czasie i po Zagładzie*. Red.: Feliks Tych. Warszawa: Fundacja Shalom.
- “Ubój niezgody”. 2013. *Znak*, 1 August. <http://znak.org.pl/?lang1=pl&page1=news&subpage1=news00&infopassid1=14993&scrt1=sn>. (Date of retrieval: 25 May 2014).
- Ubój rytualny- część postów PO przeciwko projektowi. *Nie obchodzi ich partyjna dyscyplina*, 20 June 2013. <http://www.polskatimes.pl/artukul/925056,uboj-rytualny-czesc-poslow-po-przeciwko-projektowi-nie-obchodzi-ich-partyjna-dyscyplina,id,t.html>. (Date of retrieval: 13 November 2014).
- ZIELIŃSKI, Tadeusz J. 2012. "Ustawodawstwo II Rzeczypospolitej wymierzone w wyznawców judaizmu". *Przegląd Prawa Wyznaniowego* 4.

Legal and parliamentary acts and documents:

- Charter of Fundamental Rights of the European Union* (2000/C 364/01). 2000. (http://www.europarl.europa.eu/charter/pdf/text_en.pdf. Date of retrieval: 12 August 2013).
- Council Regulation (EC) No 1099/2009 of September 24, 2009 on the protection of animals at the time of killing*. http://ec.europa.eu/food/animal/welfare/slaughter/regulation_1099_2009_en.pdf.
- European Convention for the Protection of Animals for Slaughter (of the Council of Europe)*. 1979. <http://conventions.coe.int/Treaty/en/Treaties/Html/102.htm>. (Date of retrieval: 18 September 2013).
- K 52/13. Constitutional Tribunal [Trybunał Konstytucyjny]. <http://trybunal.gov.pl/rozprawy/wyroki/art/7276-uboj-rytualny/> (Date of retrieval: 15 December 2014).
- Konstytucja Rzeczypospolitej Polskiej z dnia 2 kwietnia 1997 r.* Dz.U. 1997 nr 78 poz. 483 [Constitution of the Republic of Poland of April 2, 1997, Journal of Laws 1997, no. 78, item 483]. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU19970780483> (Date of retrieval: 10 November 2014).
- Norwegian Animal Welfare Act. Section 9 Killing*. No. 73, 20 December 1974. Ref. Previous Acts No. 7, 21 June 1929 and No. 13, 7 June 1935.
- Rozporządzenie Ministra Rolnictwa i Rozwoju Wsi z dnia 9 września 2004 r. w sprawie kwalifikacji osób uprawnionych do zawodowego uboju oraz warunków i metod uboju i uśmiercania zwierząt*, Dz.U. 2004 nr 205 poz.2102 [Ordinance of the Minister of Agriculture of 9 September 2004, Journal of Laws 2004, no.205, item 2102]. <http://www.abc.com.pl/du-akt/-/akt/dz-u-04-205-2102> (Date of retrieval: 7 August 2013).
- Rządowy projekt ustawy o zmianie ustawy o ochronie zwierząt (1370)* [Draft bill no. 1370]. <http://www.sejm.gov.pl/sejm7.nsf/druk.xsp?nr=1370>. (Date of retrieval: 7 August 2013).
- Stanowisko Prokuratora Generalnego* [Statement of the Public Prosecutor], 17 March 2014, PG VIII TK 139/13, K 52/13, <http://www.pg.gov.pl/aktualnosci-prokuratury-generalnej/zakaz-uboju-rytualnego-nie-narusza-konstytucji-i-konwencji-praw-czlowieka.html#U0u10aJoTwd>. (Date of retrieval: 14 April 2014).
- Ustawa z 24 kwietnia 2009 r. o zmianie ustawy o ochronie zwierząt*, Dz.U. 2009 nr 79 poz. 668 [Amendment of the Act on the protection of Animals of 24 April 2009, Journal of Laws 2009, no. 79, item 668]. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU20090790668+2010%2406%2430&min=1>. (Date of retrieval: 7 August 2013).
- Ustawa z dnia 17 kwietnia 1936 o uboju zwierząt gospodarskich w rzeźniach*, Dz. U. 1936, Nr 29, poz. 234, 235, 236, 237 [Act on the slaughter of farm animals in slaughterhouses of 17 April 1936, Journal of Laws 1936 no. 29 items 234-237]. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU19360290237>. (Date of retrieval: 15 April 2014).
- Ustawa z dnia 17 maja 1989 r. o gwarancjach wolności sumienia i wyznania*, Dz. U. z 2005 r. Nr 231, poz. 1965 oraz z 2009 r. Nr 98, poz. 817 [Act on the Guarantees for the Freedom of Religion and Consciousness of 17 May 1989. Journal of Laws 2005 no. 231 item 1965, Journal of Laws 2009 no. 98 item 817]. <http://isap.sejm.gov.pl/Download?id=WDU19890290155&type=3>. (Date of retrieval: 12 August 2013).
- Ustawa z dnia 20 lutego 1997 r. o stosunku państwa do gmin wyznaniowych żydowskich w Rzeczypospolitej Polskiej*, Dz. U. 1997 r. Nr 41 poz. 251. [The Act on the State's Attitude toward

Jewish Religious Communities in the Republic of Poland, Journal of Laws 1997 no. 41 item 251]. www.isap.sejm.gov.pl/Download?id=WDU19970410251&type=3. (Date of retrieval: 26 April 2014).

Ustawa z dnia 21 kwietnia 1936 r. o stosunku Państwa do Muzułmańskiego Związku Religijnego w Rzeczypospolitej Polskiej [Act on the state's attitude towards the Muslim Religious Community in the Republic of Poland of 21 April 1936, Journal of Laws, No. 30, item 240]. <http://isap.sejm.gov.pl/Download?id=WDU19360300240&type=2>. (Date of retrieval: 20 May 2014).

Ustawa z dnia 21 sierpnia 1997 r. o ochronie zwierząt, Dz.U. 1997 nr 111 poz. 724 [Act on the protection of Animals of 21 September 1997, Journal of Laws 1997, no. 111, item 724]. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU19971110724>. (Date of retrieval: 7 August 2013).

Ustawa z dnia 24 kwietnia 1997 r. o zwalczaniu chorób zakaźnych zwierząt, badaniu zwierząt rzeźnych I mięsa oraz o Inspekcji Weterynaryjnej, Dz. U. 1997, Nr 60, Poz. 369 [Act on Combating Infectious Animal Diseases, Examination of Slaughter Animals and Meat, and Veterinary Inspection of 24 April 1997, Journal of Laws 1997 no. 60, item 369]. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU19970600369>. (Date of retrieval: 15 April 2014).

Ustawa z dnia 6 czerwca 2002 o zmianie ustawy o ochronie zwierząt, Dz.U. 2002 nr 135 poz. 1141 [Amendment of the Act on the Protection of Animals of 6 June 2002, Journal of Laws 2002, no. 135, item 1141]. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU20021351141+2002%2409%2428&min=1>. (Date of retrieval: 7 August 2013).

U 4/12. Constitutional Tribunal [Trybunał Konstytucyjny]. http://www.trybunal.gov.pl/Rozprawy/2012/u_04_12.htm. (Date of retrieval: 7 August 2013).

Voting no. 77, Parliamentary Gathering no. 45. 12 July 2013. <http://www.sejm.gov.pl/sejm7.nsf/agent.xsp?symbol=glosowania&NrKadencji=7&NrPosiedzenia=45&NrGlosowania=77>. (Date of retrieval: 11 April 2014).

Wniosek Rzecznika Praw Obywatelskich. 24 October 2014 http://www.rpo.gov.pl/sites/default/files/Wniosek_do_TK_ws_uboju_rytualnego.pdf. (Date of retrieval: 11 November 2014).