
AGRICULTURE AND HORTICULTURE DEVELOPMENT BOARD CONSULTATION: QUALITY STANDARD FOR HALAL SHEEPMET

Response from Humanists UK, August 2017

ABOUT HUMANISTS UK

At Humanists UK, we want a tolerant world where rational thinking and kindness prevail. We work to support lasting change for a better society, championing ideas for the one life we have. Our work helps people be happier and more fulfilled, and by bringing non-religious people together we help them develop their own views and an understanding of the world around them. Founded in 1896, we are trusted by over 65,000 members and supporters to promote humanism. Through our ceremonies, pastoral support, education services, and campaigning work, we advance free thinking and freedom of choice so everyone can live in a fair and equal society.

We have long campaigned for an end to the exemption from the law mandating pre-stunning for religious groups providing shechita and halal meat. However, if the exemption is not to be brought to an end, then we think at the very least rules should be introduced requiring all such meat to be labeled as such. In 2014, we endorsed the petition organised by British Veterinary Association (BVA) and the Royal Society for the Prevention of Cruelty to Animals (RSPCA) calling for the labelling of non-stunned meat. The petition gained over 100,000 signatures and was debated in parliament.

OUR POSITION

We support the reduction of animal suffering resulting from human behaviour and see compassionate attitudes to animal suffering as a hallmark of a humane society. As a result, we are concerned about the treatment of food animals, both during their lives and when they are slaughtered.

Expert bodies, including the Farm Animal Welfare Committee, invariably recommend that pre-stunning of animals prior to slaughter is the best way to minimise suffering, and indeed this is reflected in the fact that the law requires such stunning to occur, except where religious exemptions apply.

As a result, our position is:

1. that stunning should always be used so as to reduce suffering by the animals being slaughtered
2. furthermore, that any use of the legal exemption while it survives should be minimised and strictly in accordance with the law, which allows the exemption only to provide meat for observant Jews and Muslims
3. that consumers should be aware at the point of purchase whether their meat has been stunned or not
4. that the process of religious slaughter does not compromise hygiene and safety standards.

We are not concerned with religious slaughter as such, so long as the first and last points are met. We acknowledge that a large proportion of the halal market for lamb consists of animals that have been stunned. We want to see the whole halal market operate in this way. Indeed, for reasons we will come onto, with the large extension of sales of halal meat for non-Muslim consumption we see this as a legal necessity and believe that legal action against slaughterhouses supplying other markets with meat from non-stunned animals would be successful. It is in this framework that we answer the consultation questions.

ANSWER TO CONSULTATION QUESTIONS

Farm Assurance

Farm Assurance should be a pre-requisite of the Halal Quality Standard Mark upon launch?

Agree.

Additional Comments:

We agree that accreditation with one of the four Farm Assurance schemes should be a prerequisite insofar as this will increase the identification and traceability of non-stunned meat produce from farm to consumer. The exemption to the Welfare of Animals at the Time of Killing Regulations 2015¹ that allows animals to be slaughtered without pre-stunning in the halal tradition specifies that this produce is for consumption **only** by Muslims (and similarly for shechita/Jews). Although we oppose this exemption in principle, we believe that whilst it remains in place, measures need to be taken to reduce the risk that such meat enters the general market, in contravention of the law.

There is substantial evidence that the meat industry is currently failing to protect consumers in this regard, with non-stunned halal and shechita meat being sold widely and unknowingly to non-Muslims and non-Jews, in contravention of the law. The RSPCA estimates that less than half of meat from animals slaughtered by Jewish methods is sold in kosher shops² and the Halal Food Authority believes that halal meat (of which 20 percent is not stunned before slaughter) now represents 25 percent of the entire meat market in the UK,³ way in excess of the number of Muslims, who currently comprise only five percent of the population.

Although we recognise that Farm Assurance will not entirely prevent the general sale of non-stunned meat products and that more stringent enforcement of the law is required across the meat industry, we support the recommendation on the grounds that it will increase the identification and traceability of non-stunned meat. Before tying the quality mark to the Farm Assured scheme, AHDB should consult with the four

¹ Department of Environment, Food and Rural Affairs, 'halal and kosher slaughter'

<https://www.gov.uk/guidance/halal-and-kosher-slaughter>

² RSPCA 'Slaughter without pre-stunning (sometimes referred to as religious slaughter)' March 2016.

https://www.rspca.org.uk/search?p_p_id=search_WAR_ptlSearchPortlet&searchKey=slaughter+without+pre-stunning

³ Dialrel, 'The development of halal and kosher meat markets in the UK.'

<http://www.dialrel.eu/images/factsheet-market-uk.pdf>

accreditation bodies to ensure that they are aware of and implement this aspect of the law. Farm Assurance should not be granted to any producer of non-stunned meat that is intended for general sale. Producers should have to demonstrate from slaughter to consumer that non-stunned meat is traceable only to specialised halal butchers and outlets which sell halal meat as part of a specialised range.

The consultation document states that 'it is important that all buyers are able to confirm easily that a producer has a valid certificate' and that producers will be issued with stickers to accompany every consignment of livestock or meat. Subject to our very serious reservations about the design of the stickers (below) this seems a sensible measure to help identify non-stunned meat and prevent general consumers from unknowingly purchasing it.

If Farm Assurance is not a pre-requisite at launch, it should become one at a later date?

Agree.

Additional Comments:

The AHDB has a duty to uphold the legal standards of processing non-stunned halal meat, including the prohibition on general consumption. Any measures to increase the identification and traceability of these products from farm to consumer, including Farm Assurance, should be considered of the highest priority. We believe that Farm Assurance should be a prerequisite at launch, and if this is not to be the case, it should be introduced as shortly after as possible, certainly not exceeding one year after launch.

If agreed, during what timescales should it be introduced?

(If processors wish to also use the Red Tractor or other marks, then the whole chain including farm, transport and processing will require assurance).

1 year.

Processing practices and segregation

Alcohol (denatured/inedible) based cleaning products cannot be used?

Disagree.

Additional Comments:

The AHDB should not endorse, through the use of this quality mark or otherwise, any measure which is likely to undermine standards of safety or hygiene either in the farm, abattoir or transportation of meat produce. It must ensure that all accredited halal produce is compliant with Government-set standards for controlling pathogenic bacteria, including the use of cleaning alcohol when necessary.

The Government's 2015 Meat Industry Guide states that alcohol wipes form part of the good practice in the cleaning of meat production tools, including knives,⁴ and they

⁴ Food Standards Agency 'Meat Industry Guide Chapter 5'
https://www.food.gov.uk/sites/default/files/Chapter5-Cleaning_0.pdf

should be used in the preparation of taking microbiological samples.⁵ It would therefore be dangerous for the AHDB to encourage halal producers to abandon the use of alcohol cleaning products in order to obtain this quality mark, when those products are deemed necessary for consumer safety.

The exemption in law that allows Muslims to conduct non-stunned slaughter extends only as far as the method of the slaughter is concerned. Beyond that, halal abattoirs, farmers and sellers must comply with the Government regulations and have regard to best practice as all other meat producers do. The AHDB should not promote less than best practice.

It is also worth acknowledging that by the time meat reaches the consumer, any alcohol cleaning products that have been used are unlikely to still be present on the meat in any case.

Sporadic DNA testing should be undertaken to guarantee exclusion of additional proteins (e.g. porcine) in processed products e.g. mince and burgers

No comment.

Additional Comments:

As long as DNA testing and the segregation of halal and non-halal meat products can be carried out with a high regard for hygiene and safety, we have no objection.

Processors must not process halal products in the same batch as any non-halal production. Practically this means processing at different times using designated dolavs, bins, trays, mincers, dicers, formers etc.

No comment.

Additional Comments:

As above.

Where businesses process non-halal products there must be strict physical segregation controls in place?

No comment.

Additional Comments:

As above.

The storage and processing of pork and raw materials of porcine origin must be physically segregated from halal products. (Dedicated equipment and storage areas must be used)

No comment.

Additional Comments:

As above.

⁵ Food Standards Agency 'Meat Industry Guide Chapter 13'
<https://www.food.gov.uk/sites/default/files/Chapter13-Microbiological-criteria.pdf>

Pre-slaughter stunning

The stunning standard should require:

- 1. No mechanical stunning**
- 2. Head-only electrical stunning. Specifically excluding electric stunning that spans the heart (e.g. head-to- back stunning)**
- 3. Minimum current of 1.0 amp with maximum current as set by EU law and independently verified to be recoverable.**
- 4. Maximum duration of stun application of 4 seconds**
- 5. Frequency of 100 Hz minimum, with higher frequencies reducing meat quality issues**
- 6. Maximum voltage 450 V**
- 7. Recording requirements to ensure the key stun parameters have been met over the audit period within stun equipment or a suitable additional stun assurance monitor i.e.**
 - Maximum constant current (A or mA).**
 - Maximum voltage (V).**
 - Minimum frequency (Hz).**
 - Maximum time of exposure.**

No view.

Additional Comments:

As stated above, the exception for non-stunned halal meat extends only as far as the method of slaughter is concerned. Therefore, the standards for pre-stunned halal meat should conform as closely as possible to the methods and standards of non-halal meat. We are mostly content that proposed specifications for pre-stunned halal meat are in accordance with those recommended generally for head-only electrical stunning, specifically the standard amperage, stun duration and voltage.

However, we note that AHBD pre-stun criteria number 5: 'frequency of 100 Hz minimum' is not in line with the Humane Slaughter Association's (HSA) guidelines that state 'if electrocution is being carried out, the frequency of the current should be no greater than 100 Hz, as frequency increases, ventricular fibrillation is less likely to result'⁶, prolonging the slaughter process.

We also recommend that these criteria should be extended to include the provision that the fatal incision is made no more than 15 seconds after the stun is applied. This is in line with the HSA's policy to avoid an animal recovering from the effects of the stun and therefore able to experience pain upon slaughter. Although the halal tradition mandates that pre-stunning is only permissible if the animal could, in theory, recover, in practice, the pre-stunned quality mark should be a guarantee that the animal did not, in fact, recover before slaughter.

Should post-cut stunning form part of the scheme? (it is proposed that both electric and mechanical stunning may be applied after the neck cut)

Disagree.

Additional Comments:

⁶ Humane Slaughter Association, 'Electrical Stunning of Red Meat Animals'
<https://www.hsa.org.uk/electrical-stunning/currents>

Despite one percent of halal meat being slaughtered in this way and the Farm Animal Welfare Committee (FAWC) recommending this method as a stop-gap measure until the religious slaughter exception is repealed, it is unclear what the legal position of post-cut stunning is. It is not specifically referred to as a permissible method of religious slaughter in the 1995 Welfare of Animals (Slaughter or Killing Regulations) Act. Furthermore, the Act also states (schedule 12 article 7):

“the occupier of a slaughterhouse in which animals are slaughtered by a religious method and any person engaged in the slaughter by a religious method of any animal shall ensure that where the animal has not been stunned, or stunned and pithed, before bleeding it is not moved until it is unconscious and in any event not before the expiry of– (a) in the case of any sheep or any goat, a period of not less than 20 seconds.”⁷

This implies that an animal slaughtered without pre-stunning should not be interfered with or moved either by the abattoir attendant or any equipment until it has become unconscious. The recommended amount of time within which a post-cut stun should be applied is no more than five seconds.⁸ So by the time that 20 seconds has passed, post-cut stunning is no longer meaningful as a means of reducing the suffering experienced by the animal. As such post-cut stunning is of questionable legality as it falls outside of legally sanctioned method of non-stunned halal slaughter. Furthermore, unless applied immediately, which is prohibited under the current regulation, it is not an effective means of reducing suffering. This applies equally to mechanical and electrical stunning.

It is also clear that the FAWC only recommended post-cut stunning as a method to be used in the interim until such time as the Government repealed the religious slaughter exception. It was not promoting it as a permanent or standalone method of halal slaughter, as implied by the AHDB proposals. To do so would be to unduly broaden the religious slaughter exception which was intended to only apply to a very limited number of slaughters conducted under a narrowly defined set of criteria. Any move to promote ‘post-cut’ stunning by the AHDB would make it an accessory to a practice of questionable legality.

Auditing

AHDB’s consumer research demonstrated that a halal scheme would need to be audited by a Muslim assessor or an assessor accompanied by a suitably experienced Muslim, in order for it to be widely accepted.

Is this a view shared by processors and stakeholders?

Yes.

Additional Comments:

As a statutory levy board the AHDB is a public body and therefore has to pay due regard to the employment provisions of the Equality Act 2010. Although we oppose the unnecessary use of Genuine Occupational Requirements (GOR) to discriminate on

⁷ The Welfare of Animals (Slaughter or Killing) Regulations 1995
<http://www.legislation.gov.uk/uksi/1995/731/schedule/12/made>

⁸ RSPCA ‘Position statement on pre-stunning and slaughter’
<http://politicalanimal.org.uk/wp-content/uploads/2015/05/Pre-stunningandslaughter.pdf>

the grounds of religion and belief in employment, in this particular case there is an argument that to do so is a proportionate means of achieving a legitimate end. The AHDB has alluded to market research evidence pointing to a need within the Muslim community for a Muslim auditor in order for the scheme to be widely accepted. If the evidence does support this claim then it could be argued that limiting this post to Muslim candidates could be a proportionate means of achieving this aim and thus is not in breach of the Equality Act.

Marketing

Would your business use the Halal Quality Standard Mark?

No

If yes, which mark would be utilised?

N/A

Are there any other specific areas of marketing support that would prove beneficial?

We note AHDB's claim that its proposed quality marks will allow consumers to differentiate between meat from animals that have been pre-stunned before slaughter and those that have not. Such labelling is important: the evidence suggests that a substantial amount of non-stunned halal meat is unlawfully entering the general market. This measure is necessary to tackle this problem at a consumer level, and to give purchasers the power to choose products in line with their belief system, including humanists and other non-Muslims who hold a belief in the humane treatment of animals.

FAWC first recommended that all meat produced using religious methods 'should be clearly labelled to indicate the method of slaughter'⁹ in 1985. Over the intervening 32 years, this recommendation has been repeated by the RSPCA,¹⁰ the BVA,¹¹ and the HSA,¹² as well as being recommended for legislation by the European Parliament on two occasions. There is also widespread public support for such a system, with a 2015 study, carried out by the European Commission, revealing that 72% of respondents supported labelling.¹³

While the current designs proposed for these labels will for the first time enable differentiation between stunned and non-stunned meat, they are nonetheless inadequate. The central point of introducing this labelling system is to bring ease and

⁹ RSPCA 'Slaughter without pre-stunning (sometimes referred to as religious slaughter)' March 2016.

https://www.rspca.org.uk/search?p_p_id=search_WAR_ptlSearchPortlet&searchKey=slaughter+without+pre-stunning

¹⁰ RSPCA, 'Religious Slaughter'

https://www.rspca.org.uk/adviceandwelfare/farm/slaughter/religiouslaughter/-/articleName/FAD_AllAboutAnimalsSlaughterReligious

¹¹ British Veterinary Association, 'Welfare at Slaughter'

<https://www.bva.co.uk/News-campaigns-and-policy/Policy/Ethics-and-welfare/Welfare-at-slaughter/>

¹² Humane Slaughter Association 'Religious Slaughter Factsheet'

<https://www.hsa.org.uk/downloads/related-items/religious-slaughter.pdf>

¹³ European Commission DG Health and Food Safety 'Study on information to consumers on the stunning of animals Final Report' March 2015.

https://humanism.org.uk/wp-content/uploads/EU-fci-stunning_report.pdf

clarity to consumers. This current recommendation singularly fails to achieve this. The two labels are nearly identical and neither actually indicates whether pre-stunning has taken place. The former only contains the word 'Halal Assured' with a tick symbol and the latter has the words 'Halal Assured' with the word 'halal' repeated in Arabic script. This wording is pointless: even Muslims will be confused and probably not realise there is a difference between the two different labels. As to the general public who want to know whether the animal was humanely slaughtered or not, the labels will seem entirely irrelevant.

The consultation document actually acknowledges this, saying 'the wording "stun / with pre-stunning" will not be used in the primary branding of either mark' and that information on slaughter practices will be 'detailed in sub-branding' with no further information on what this will mean in practice. Presumably information on the method of slaughter will be relegated at best to the small print on a subsidiary label on the back of products or at worst be available only by reference to a document on the AHDB website or available on request. In either case it will be either unnoticed or overlooked by almost all consumers, both Muslim and non-Muslim.

The proposed design for the labels runs counter to the findings of The European Commission's study on consumer information on stunning, which found a strong preference for distinctive labels using wording to indicate if stunning had taken place. This study revealed that 48% of meat purchasers would look for this information.¹⁴ With nearly half of consumers interested in this information, there is a strong argument that it should form a prominent part of the primary branding and not be hidden away on the back of the package. Of these respondents, 45% (the largest view represented) thought that labelling should be different, indicating a demand for two distinctive labels.¹⁵ The study also revealed that over half of respondents believed that a clear written system of identification (i.e. using words such as 'pre-stunned' and 'not stunned') was the best method.¹⁶ The most effective way for the AHDB to implement these recommendations would be to amend the label design to include the words 'Pre-Stunned' and 'Not stunned' and for these words should feature prominently in the primary branding.

It is also unclear which label will be applied to 'post-cut' stunned meat. The consultation document states 'due to the latency of the onset of unconsciousness, such carcasses/meats cannot be labelled as traditional halal slaughter.' As no specific 'post-cut' label is proposed in the document, this would imply that such meats would be assigned the other label (i.e. pre-stunned). However, this would be totally inappropriate, first and foremost because this meat is not 'pre-stunned.' The notion of 'pre-stunned' implies that this process took place before slaughter and not after the fatal cut has been made to the conscious animal. AHDB's current proposals are certainly misleading in this regard.

AHDB also needs to consider the impact on equality that these labels will have. Masood Khawaja, president of the Halal Food Authority in 2010 said that 'as Muslims have a choice of eating halal meat, non-Muslims should also have the choice of not eating it.

¹⁴ Ibid.

¹⁵ Ibid p34.

¹⁶ Ibid.

Customers should know it is halal meat.¹⁷ This argument should be at the core of AHDB's thinking when it comes to halal branding. AHDB has indicated that the launch of these labels will be accompanied by a campaign to educate consumers about the difference between these labels. However, this raises concerns about whether this campaign will be targeted broadly enough to reach affected groups outside of the Muslim community, where in practice a lot of halal meat is sold and consumed. Such a proposal is likely to disproportionately disadvantage humanists and other groups who hold the philosophical belief that to slaughter an animal without pre-stunning (including 'post-cut' stunning) is both cruel and inhumane. Moreover, the need and expense of an education campaign could easily be negated by adequately labelling these products in the first instance.

Aside from the details of the design, we note the lack of detail in the consultation paper about how the labelling would be applied in practice. It is comparatively simple for packaged products such as shrink-wrapped joints etc. What, however, does the AHDB propose for unpackaged meat? And what about meat sold in restaurants, cafés, and other such outlets?

We recommend that the method of slaughter is detailed on the stockist stickers, and guidance is provided on how to display this information. This will be particularly helpful to consumers in instances where meat is sold unpackaged and unlabelled, such as over the counter in butcher's shops or supermarkets. A simple symbol should also be devised and promoted for use on menus in restaurants to signify that meat comes from unstunned animals.

General

Are there any further criteria you would like included in the Halal Quality Standard Mark?

We recommend that one criterion for the 'unstunned' quality mark be that such meat be sold only via specialised halal butchers and outlets. The exemption in the law allowing for religious slaughter was intended to cater only Muslims and Jews who wished to eat meat prepared in accordance with their religious beliefs. It was not intended as a means by which animal welfare regulations could be circumvented more widely, including for meat sold to general consumers. The regulations clearly specify that such slaughter be carried out only by members of these faiths and only for consumption by Muslims and Jews who adhere to these traditions. Our suggested criterion is necessary to uphold both the letter and spirit of the law. If the AHDB is to launch this scheme without this requirement it could leave itself vulnerable to accusations that it is endorsing and facilitating an illegal practice.

Do you have any further comments on the Halal Quality Standard Mark? (continue on additional sheet if required)

No comment.

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¹⁷ Christopher Barclay 'Religious Slaughter' House of Commons Library, 11 June 2012. <http://researchbriefings.files.parliament.uk/documents/SN01314/SN01314.pdf>.

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Signature:

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Please tick which sector is relevant to your response:

Other: Charity/voluntary sector

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