

Muslim Council of Britain

Response to DEFRA Consultation process on

FAWC REPORT ON THE WELFARE OF FARMED ANIMALS AT SLAUGHTER OR KILLING - PART 1: RED MEAT ANIMALS

Evaluation of religious slaughter is an area where many people have lost scientific objectivity. This has resulted in biased and selective reviewing of the literature. Politics have interfered with good science.

Grandin & Regenstein(1994)

1. The Muslim Council of Britain (MCB) is the largest Muslim umbrella organization with over four hundred national, regional and local Muslim bodies and associations including mosques as its affiliates. It aims to enable the Muslim community to realise its full potential by participating in and contributing to the mainstream society.
2. Islam is a way of life, governed by what is prescribed in the Holy Qur'an and by the traditions of the Prophet Mohammed, peace be upon him. Our dietary laws are well defined. While consumption of meat is allowed, this concession is not without responsibilities. There is clear guidance on which animals can be consumed for food and which are prohibited. Together with the permission to kill animals comes the guidance on how the animal should be reared, grazed, what they should be fed, how they should be slaughtered in one swift stroke by severing both carotid arteries, jugular veins, esophagus, and trachea, using a very sharp knife. These guidelines provided to us over 1400 years ago epitomize the basic principles of animal welfare that make religious slaughter most humane – it is the least painful method of slaughter.
3. We believe in the wisdom of this Divine Code of Practice; it is important that we follow this Code in its totality; we cannot pick and choose from these principles.
4. The right to practice our faith is enshrined in Article 9 of the European Convention for the Protection of Human Rights and Fundamental Freedoms. UK legislation makes provision for religious slaughter by exempting Muslims and Jews from stunning animals before they are slaughtered (Welfare of Animals at Slaughter (or Killing), Regulations 1995, Part IV, Regulation 22).

5. The Farm Animal Welfare Council's (FAWC) statement in Para 201, "Slaughter without pre-stunning is unacceptable and that the Government should repeal the current legislation" is misleading and is not based on objective evidence - Para 194 states, '*it is difficult to measure pain and distress during the slaughter process in an objective manner*'. This is not the first time FAWC have made such a recommendation; a similar demand in their previous report (1985) was also rejected after representations from the affected religious communities. The arguments presented then have not changed - in fact they have been strengthened by scientific publications^{1, 2,3}.
6. While we welcome the Government's decision to reject recommendation 61 (para 201) we take strong issue with the conclusion that "on balance, animals (especially cattle) slaughtered without pre-stunning are likely to experience very significant pain and distress before insensibility supervenes". This has caused much disquiet and unrest among the community and distracted from wider constructive discussion with the community on finding ways of improving animal welfare and enforcing WASK regulations.
7. Objective evaluation of published scientific evidence clearly shows how attention to the design and operation of slaughterhouse and careful handling of cattle reduces fear and distress among the animals. Religious slaughter is the least painful and most humane method, it does not compromise animal welfare or pose risk to human health.
8. The work of Grandin¹ and of Schulze et al²(ignored by FAWC, is also summarized below. Grandin considered three main areas:
 - a) **Features that keep the animals calm and reduce stress** (applicable to both religious as well as mainstream slaughter after stunning):
 - Design features in the slaughterhouse (lairage, non-slippery flooring, solid walls, non-reflective surfaces, lowering of noise),
 - Use of Upright Body and head restraint systems
 - Automated conveyor track
 - If handled gently and calmly, cattle enter voluntarily into the box,
 - 'Cattle will place their heads in a well-designed head restraint device that is properly operated by a trained operator⁴.
 - b) **Pain perception during incision¹:**
 - Use of very sharp knife, at least twice as long as width of the neck
 - Adequately trained, experienced operator
 - Swift cut, avoiding see saw movements
 - Severance of carotid arteries on both sides

- Reaction 'no more than a flinch' when the throat is cut,
- No further reaction of the animal's body or legs during the throat cut,
- *'it appears that the animal is not aware that its throat has been cut'*

c) Time to loss of sensitivity:

- Calm cattle collapsed quickly (often within 10 to 15s) and have a more rapid onset of insensibility.
- severing both carotid arteries and jugular veins (required by WASK Religious slaughter Regulation significantly reduces the time to loss of sensitivity
- Using rapid cutting stroke (95%) of calves collapse almost immediately⁵.
- Conversely, a slow knife stroke retained consciousness for up to 30 seconds in up to 30% cattle.

It is clear therefore, that provided attention is given to the design, construction and operation of the slaughterhouse, appropriately trained personnel are employed to handle animals appropriately, religious method is the least painful and most humane method of slaughter. That this evidence is based on work with cattle is further proof that on balance cattle slaughtered without pre-stunning DO NOT experience very significant pain and distress'.

It is only appropriate, therefore that the Government rescind their statement that animals (especially cattle) slaughtered without pre-stunning are likely to experience very significant pain and distress.

Islamic method of slaughter is most humane and least painful:
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A study carried out by Prof Schulze and colleagues at the School of Veterinary Medicine, University of Hanover, Germany ² has shown that EEG recordings in animals slaughtered by the Islamic 'halal' method did not show any change from the graph before slaughter during the first 3 seconds - indicating thereby that the animal did not feel any pain. The EEG recordings of the following 3 seconds showed a condition of deep sleep – unconsciousness; due to large quantity of blood gushing out of the body. Following these 6 seconds, the EEG recorded zero level while the ECG showed heart beating and body convulsing – a reflex action of the spinal cord); simultaneous ECG recordings showed rapid pulse.

EEG recordings of animals that were subjected to stunning by the captive bolt method were apparently unconscious soon after stunning but the EEG showed severe pain immediately after stunning followed by cardiac arrest.

Stunning and Animal Welfare problems:

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Several methods are used for stunning animals. Each method has its inherent problems and failure rate.

- Re-stunning is difficult to achieve and subjects the animals to considerable pain and distress.
- 'Mis-stunned' animals may not be detected and conscious animals go through the process that is meant for unconscious animals.
- Stunned animals (e.g. by electrical 'head only' method) regain consciousness before slaughter - the stunning-sticking time has to be shorter than is achievable in practice. Grandin advises 10 sec stun-to-stick time (while FAWC recommend 20 sec). In practice this short stun-to-stick time is difficult to achieve. Consequently greater pain and suffering will be endured by millions of animals (nearly one in five of the 37.3m red meat animals) that will regain consciousness but go through the mechanized procedures in the abattoir as if they are unconscious:

Animal Species	Total killed	Stunned animals regaining consciousness	
		Number	Percentage
Cattle	2.3 m	0.23 m	10.0%
Sheep	18.7 m	5.00 m	26.7%
Pigs	16.3 m	1.80 m	11.0%
Total	37.3 m	7.03 m	19.0%

- Thus one-in-five animals intended to be slaughtered / killed while unconscious is in fact conscious. Animals subjected to mainstream slaughter methods indeed undergo 'very significant pain and distress'. We agree with FAWC's statement "welfare assessment concerns individual animals; the more animals which are affected, the more serious is the problem' - 7.3m in this case.
- The report observes that only a small number of electrical stunning systems are used installed in Great Britain (para172), the equipment in use had 'nothing to indicate the currents applied or under load', Para 178 highlights the need to "produce guidance for

slaughterhouse operators on recognizing an effective stun/kill when using electrical equipment on cattle". These observations do not inspire confidence that electrical stunning of cattle provides a means of improving animal welfare.

- In addition to the process of electrical stunning, a process of spinal depolarization is carried out before the animal is ejected from the stunning crate (para 173). This additional procedure is necessary to protect operators from injury otherwise caused by 'reflex movement' in the stunned animals. This appears to be an additional opportunity for mishaps.

Risk to human health & safety – vCJD associated with BSE:

Stunning can spread germs in the abattoir environment⁶. Captive bolt stunning scatters the brain into the major parts of the animal's body such as heart, lung, liver, thus posing a risk to human health^{7,8,9}. Certain forms of captive bolt methods have been shown to increase the risk of BSE prompting the SSC of EU to ban pithing and pneumatic methods. In Para 162 FAWC refer to concerns 'about the use of captive bolt stunners also prove in the light of nvCJD'. FAWC go on to state, "the potential loss of this tool without a suitable substitute would present major animal welfare challenge." Slaughter without stunning offers a suitable substitute to captive bolt, electrical methods and to the use of aversive gases.

The notion that stunning solves all animal welfare problems is simply not true; stunning creates more problems than it solves. It is likely that other forms of stunning may be shown to increase the risk of spread of BSE or other diseases.

Illegal Slaughter – an animal welfare issue not addressed in FAWC Report:

In recent years there has been much publicity about illegal slaughter, diseased and emaciated carcasses entering food chain. At their recent Annual Conference the Chartered Institute of Environmental Health joined several welfare organisations and professionals who have expressed concern over the increasing number of animals involved in illegal slaughter and the entry of meat unfit for human consumption in the food chain. "Meat crimes threaten public health, violate people's religious belief and abuse their trust and frequently involve cruelty to animals."¹¹

There is no mention of this aspect of animal welfare in FAWC report. After arms and narcotics the trade in illegal meat is considered to be the third biggest illegal trade estimated to be worth up to £1bn a year.¹⁰

Recommendation 62 (Para 203): Until the current exemption which permits slaughter without pre-stunning is repealed, Council recommends that any animal not stunned before slaughter should receive an immediate post-cut stun.

MCB Response: The benefits of slaughterhouse design, animal handling, use of appropriately designed restraints, severance of both carotids – together provide substantial animal welfare benefits. What is the point of subjecting the animal to pain twice?

Recommendation 63 (Para 210): The law should be changed to permit the bleeding of pigs and sheep within sight of their con-specifics in England and Wales, provided that a maximum stun to bleed time of 15 seconds is set down in legislation.

MCB Response: Islamic rules of slaughter do not allow killing of an animal in front of another. Therefore we do not accept this recommendation and wish to ensure that this is not introduced as a requirement.

Recommendation 65 (Para 213): The law should require that bleeding should be carried out by severing both carotid arteries.

MCB Response: Islamic method of slaughter includes severance of both carotid arteries and jugular veins and is required as part of the WASK 1995 regulation (Religious Slaughter). We accept this recommendation and suggest that it should also be included for mainstream slaughter.

Summary:

The statement "Slaughter without pre-stunning is unacceptable and that the Government should repeal the current legislation" (para 201) is misleading and not based on any objective evidence. We welcome the Government's decision to reject this recommendation.

The Government, however, have given the wrong reason for the rejection - their conclusion that "on balance, animals (especially cattle) slaughtered without pre-stunning are likely to experience very significant pain and distress before insensibility supervenes" is incorrect and is based on selective information and not on objective evidence. This has caused much disquiet and unrest among the community and distracted from wider constructive discussion. The Islamic method of slaughter is the most humane and least painful, achieves stun and kill in one step and prevents the spread of BSE / vCJD. It is only appropriate that they rescind this statement.

We endorse recommendation 65 (para: 213), requiring 'bleeding to be carried out by severing both carotid arteries'. Doing so will bring mainstream WASK in line with current requirement in religious slaughter legislation.

The notion that stunning solves all animal welfare problems is simply not true; stunning creates more animal problems than it solves.

References:

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