



The consultation response of the Royal Society for the Prevention of Cruelty to Animals (RSPCA), to the Agriculture and Horticulture Development Board (AHDB) proposals for a Halal quality assurance scheme

Introduction

The RSPCA is grateful for the opportunity to comment on the proposal to establish a Halal quality assurance scheme. Unfortunately, the consultation response form has proved very restrictive in terms of ease of use, which is why we have decided to answer the questions on a traditional word document. We have confined our comments to those in which we believe are directly related to the welfare of the animals.

The RSPCA is a co-signatory to a statement relating to non-stun slaughter alongside the British Veterinary Association (BVA) and the Humane Slaughter Association (HSA), which states that we believe that the scientific evidence demonstrates that slaughter without pre-stunning compromises animal welfare, and therefore all animals should be effectively stunned before they are slaughtered.

Consultation questions

1. Should farm assurance be a pre-requisite of the Halal Quality Standard Mark upon launch?

Consumer expectation is that farm assurance schemes should deliver, at the very least, to minimum legal requirements. In our view, because slaughter without stunning is an exception from the law, then a United Kingdom (UK) assurance scheme should question whether permitting such practices is consistent with consumer expectation, particularly in the light of the possibility of non-stunned animals entering the food chain and being purchased by consumers who expect animals to be stunned prior to slaughter. A robust traceability system must therefore be in place to ensure this does not happen, and strict segregation protocols of pre- and non-stunned products must be an integral part of any proposed assurance scheme. This includes those animals that have been slaughtered without pre-stunning, but are then for whatever reason, rejected and considered 'Haram'.

Food derived from animals slaughtered without stunning should only be destined to those who specifically require such meat. This demand will then determine the

amount of non-stunned meat that is available. Only clear assurance identification marks will enable this to happen.

2. Pre-slaughter stunning

As mentioned above, the RSPCA believes that all animals must be pre-stunned prior to slaughter. In the proposals, it mentions that the maximum duration of stun application is 4 seconds. The RSPCA would recommend that a minimum stun time duration is also specified, i.e. for head-only electrical stunning, the RSPCA standards require a minimum time of 3 seconds. If no minimum duration stun is specified, what is to stop a very minimal contact stun being delivered? Such a stun would likely be inadequate to render the animal immediately unconscious which would be unacceptable on welfare grounds, as well as being in contravention of the Regulations.

Should a minimum voltage be prescribed?

It would be useful to have some form of guidance in the proposed assurance standards relating to the signs of an effective head-only electrical stun as a source of information. It is unclear whether this will be in the 'Best Practice' guide or not.

There must be a back up stunning method available. Although this is a legal requirement, we believe it must also be explicitly stated in the proposed assurance standards.

3. Should post cut stunning form part of the scheme? (It is proposed that both electrical and mechanical stunning may be applied after the neck cut)

This method does not afford the animal the same protection of a pre-cut stun. However, it could constitute a refinement of the non-stun procedure and would only be encouraged within this context. It would not, however, be considered an acceptable alternative to a pre-cut stun. Further, this should be worded 'immediate' post cut stunning. It is also unclear what sort of label this meat will carry.

4. Auditing

The RSPCA believes that it should be made explicit as part of the farm assurance standards that the Official Veterinary Surgeon (OVS) will be given sufficient time and resources to adequately monitor welfare during the non-stun slaughter process in addition to conducting their other duties. This was one of the important points made in the statement by the BVA, HSA and RSPCA.

5. Marketing/labelling

As mentioned above, the RSPCA has previously been a co-signatory to a statement with the BVA and the HSA relating to this issue. In this statement, one of the proposed areas for development was to provide the consumer with both information and a simple assurance logo on the packaging, which distinguished between meat that has come from animals that had been pre-stunned and those that had not been pre-stunned.

We believe the proposed certification marks should have the words 'pre-stunned' and 'non-stunned' clearly stated on them, because as it stands, the marks are not distinct enough, being of the same shape and very similar in colour, which diminishes the intended distinction in our view.

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

As mentioned in question 5 above, greater distinction between the marks will help to inform the consumer requiring non-stunned sheepmeat, and it should also prevent non-stunned meat entering the conventional market. Criteria relating to any animals which have received a post-cut stun still need to be elucidated in our view.