



A response to the Agriculture and Horticulture Development Board Halal quality assurance scheme consultation

August 2017

Summary

Whilst we welcome the Agriculture and Horticulture Development Board's intention to "boost customer choice" with the introduction of standard marks, we are concerned that the proposed labelling lacks clarity and therefore fails to provide the necessary information to enable consumers to make an informed choice.

About the National Secular Society

The National Secular Society works for the separation of religion and state and equal respect for everyone's human rights so that no one is either advantaged or disadvantaged on account of their beliefs. We advocate for an end to the religious exemption from legal requirements to stun animals before slaughter.

Whilst we support the right to religious freedom, this is not an absolute right, and we do not think that exemptions should be made on religious grounds to animal welfare regulations intended to ensure that farm animals are slaughtered under the most humane conditions possible.

We have long argued that while slaughter without pre-stunning is permitted, meat produced from animals not stunned before slaughter should be clearly labelled to allow consumer choice.

Our response to the proposals

1. We are supportive of measures to introduce on-pack labelling to "help customers choose products on shelves". However, the proposed 'standard marks' are not clear enough to ensure that customers have the information they need to make an informed choice.
2. It is highly problematic that neither of the standard marks intended for halal sheepmeat indicate whether pre-stunning has taken place. The two standard marks are very similar and do not provide the information required by consumers who wish to avoid meat from animals killed without pre-stunning under the legal exemption.

3. The decision not to use the wording 'stun / without stunning' in the primary branding, relegating this crucial information to 'sub-branding' only available through further research, is highly regrettable. We particularly object to the use of Arabic writing on the 'traditional' label: most British consumers will not know what the label means or be able to tell that the meat has not been stunned.
4. It is worth considering that much of the anxiety about 'halal' meat stems from the public confusion around method of slaughter used, with many consumers believing 'halal' is synonymous with non-stun slaughter.
5. However, as the AHDB will be aware, in the production of halal meat, pre-stunning is common. A Food Standards Agency (FSA) animal welfare survey undertaken in abattoirs across Great Britain during one week in September 2013 showed around 84% of animals slaughtered by the Halal method were stunned before slaughter. More accurate labelling would provide assurance and clarity where there is currently confusion, and also ensure that meat from non-stun slaughter is not sold to markets it is not intended for.
6. The law is clear that meat from animals killed under the exemption is only supposed to be for the consumption of Muslims and Jews. Clearer method-of-slaughter labelling would ensure that the food and farming industry acts responsibly by ensuring that this targeting of supply occurs and that unsuspecting members of the public are not duped into buying meat from non-stun slaughter.
7. We are concerned that opposition to clear method-of-slaughter labelling is driven by a desire to artificially subsidise the non-stun religious slaughter industry. A lack of clear, accurate labelling results in customers being deceived into purchasing meat killed under the exemption. A failure to provide clear, accurate labelling would result in the AHDB being complicit in this deceit.
8. We therefore urge you to ensure that consumers are better informed and protected by adding clarity to the proposed standard marks – making clear whether halal sheepmeat is from animals slaughtered without stunning under the legal exemption, or from animals that have been pre-stunned in accordance with animal welfare law.

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