Introduction and background

1. The British Veterinary Association (BVA) welcomes the opportunity to provide comments on Eblex’s proposals for assurance standards for Halal sheepmeat.

2. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 14,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.

3. This response addresses the questions and issues which are relevant to the veterinary profession. The BVA is not in a position to be able to respond to the more in-depth technical questions about processing practice. Therefore this response has been put together in this format, rather than using the response sheet or online survey.

BVA comments

Stunning at slaughter

4. The BVA’s view is that all animals should be stunned before slaughter and if slaughter without stunning is still to be permitted then any meat or fish from this source must be clearly labelled. This will enable consumers to fully understand the choice they are making when purchasing such products.

5. BVA’s concern is for the welfare of those animals that are not stunned. Our concerns have nothing to do with the expression of religious beliefs but with the practice of killing by throat-cutting without pre-stunning.

6. We consider that food derived from animals slaughtered without stunning under the legal exemption, should be destined for domestic consumption by the specific religious communities according to whose beliefs the animals have been slaughtered. The size of these specific markets should determine the amount of non-stunned meat produced. Slaughterhouse operators must be able to demonstrate that the conditions for exemption from stunning are met.
Post cut stunning

7. BVA’s clear position on welfare at slaughter is set out above. However, as a result of the current absence of a legal requirement for all animals to be stunned prior to slaughter, a separate stand-alone policy position has been developed on the option of post-cut stunning.

8. BVA recognises that while pre-stunning is superior from a welfare point of view; should non-stun slaughter continue to be permitted, post-cut stunning offers a valid means of reducing the suffering of animals at slaughter. Therefore the option of post-cut stunning is not equivalent to pre-cut stunning, but presents a highly desirable refinement if government policy does not change.

Labelling

9. In view of the current legality of slaughter without stunning, it is important to educate consumers about animal welfare at slaughter and give them informed choice when buying meat or meat products.

10. The BVA is calling for one clear EU-wide welfare label that takes into account the whole-life welfare of food animals including the production system, method of transport and whether the animal was stunned before slaughter or not. We believe that the current voluntary labelling system is confusing for consumers. Country of origin labelling should include information on where the animal was born/hatched, reared and slaughtered.