
Improving Animal Welfare during Religious Slaughter

Recommendations for Good Practice

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PREFACE

The project 'Religious Slaughter: Improving Knowledge and Expertise through Dialogue and Debate on Issues of Welfare, Legislation and Socio-economic Aspects', called DIALREL, was a European Community specific support action project co-ordinated by Cardiff University. The main aims of the DIALREL project were to explore the conditions for promoting dialogue between interested parties and stakeholders as well as to facilitate the adoption of good religious slaughter practices. The project focused on the slaughter of cattle, sheep, goats and poultry (mainly chicken and turkey). An additional aim was to review and propose a method/procedure/system for the implementation and monitoring of good practice. The implementation has been achieved through consultation, gathering, exchanging and reviewing information, and networking. More details about the project can be found on the web site <<http://www.dialrel.eu>>.

The present document contains a number of recommendations from the viewpoint of veterinary science on practices related to religious slaughter. It is based on best available knowledge: a scientific workshop on religious slaughter practices held in Girona on 3 and 4 February 2010; the final workshop of the project held in Istanbul on 15 and 16 March 2010; the report 'Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences' (DIALREL deliverable 1.3, <<http://www.dialrel.eu/images/veterinary-concerns.pdf>>); spot visits carried out to assess the procedures currently used for religious slaughter (DIALREL deliverable 2.2); and the comments made by different stakeholders on earlier drafts of the present document.

The scientific workshop aimed at presenting findings from DIALREL and discussing with scientific experts practical recommendations for religious slaughter practices to improve animal welfare during slaughter. The scientific delegates were: Hamid Ahmad (United Casing Corporation, Pakistan); Lotta Berg (Swedish University of Agricultural Sciences, Sweden); Clyde Daly (Carne Technologies, New Zealand); Bruno Fiszon (Le Grand Rabbinate de France, France); Troy Gibson (Royal Veterinary College, UK); James Kirkwood (Universities Federation for Animal Welfare, UK); Rasto Kolesar (World Society for the Protection of Animals, UK); Luc Mirabito (Institut de l'Elevage, France); Mohan Raj (Bristol University, UK); Joe Regenstein (Cornell University, USA); Shuja Shafi (Muslim Council of Britain, UK); Yunes Teinaz (Muslim Council of Britain, UK); and Tahsin Yesildere (Istanbul Veteriner Hekimler Odası, Turkey).

Later, the recommendations were discussed with the following members of the Advisory Board and stakeholders: Nizar Boga, Rizvan Khalid (Euro Quality Lambs Ltd, UK), Fettallah Otmani (AVS, France), Yusuf Calkara (European Institute of Halal Certification, Germany), Masoud Khawaja (Halal Food Authority, UK), Pinkas Kornfeld (European Board of Shechita), Stuart Rosen (Shechita Board, UK), Michel Courat (Eurogroup for Animals), Nancy De Briyne (Federation of Veterinarians of Europe), Zeev Noga (Euro-

pean Livestock and Meat Trading Union), Cees Vermeeren (Association of Poultry Processors and Poultry Trade in the EU Countries), and Phil Hadley (EBLEX, UK).

The document represents the views of the authors and does not necessarily represent a position of all the scientific delegates, members of the Advisory Board and stakeholders. Their comments on the final text are included in the Appendix of the document. It should be stated that the reliability of some figures in the following recommendations have often been questioned by some religious slaughter representatives. Literature and scientific evidence used in this set of recommendations are based on best available knowledge from peer-reviewed publications and the long-standing experience of the authors, who have observed significant numbers of animals at European slaughterhouses, both religious and non-religious facilities. The evolving and dynamic nature of scientific investigations could improve the understanding of some of the implications of different religious slaughter practices in the future.

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GENERAL OUTCOMES AND RECOMMENDATIONS

The document proposes good animal welfare practices during religious slaughter, including restraining, neck cutting and post-cut management. As reversible stunning is also accepted by some religious communities, recommendations for pre- and post-slaughter stunning are also included.

This document does not aim to discuss religious rules. The recommendations are intended as a proposal to improve animal welfare during religious slaughter, taking into account existing legislation and religious slaughter requirements in the general context and in the case of specific incidents.

Best methods must be employed to ensure calm animals/birds are made ready for slaughter. The management of animals during transport, unloading, lairage, restraining, reversible stunning or slaughter must follow the approved standard operating procedures to ensure the welfare of all the animals. These should include clear management objectives, participation of the responsible persons, appropriate modus operandi, measurable criteria of success, as well as regular monitoring of procedures and recording of outcomes. For failures in meeting standards, appropriate corrective actions should be defined. All facilities should develop effective working and training procedures.

One person should be designated within the religious authority as being the responsible person for ensuring compliance with religious slaughter requirements and, in addition, for optimizing animal welfare protocols within those requirements.

Specific training of slaughtermen and abattoir staff, including management in key areas (such as animal handling, restraint, knife sharpening, animal physiology, signs of stress and pain, times to unconsciousness and signs of loss of consciousness), is vital to ensure good animal welfare.

RESTRAINING METHODS

MAIN OUTCOMES

Restraint (design, construction, operation and maintenance) has a marked impact on animal stress, which will in turn impact on the qualities of the cut, bleeding and the time to loss of consciousness.

In cattle, the use of an upright pen can reduce the duration of restraint required until neck cutting is applied and allows the animal to be slaughtered in a natural standing position. However, this position may require greater skill in achieving an appropriate cut and managing the post-cut period.

In cattle, a rotatable restraint might facilitate neck cutting. However, this type of restraint may lead to increased stress. Dorsal recumbency (animal turned on the back) is an unnatural posture and might also cause discomfort. Turning to positions between upright and lateral recumbency (e.g. 45° or 90°) has the potential to decrease stress.¹

Sheep and goats can be restrained in either an upright position, lying on their side or lying on their back (rotating to angles other than 90° or 180° are also used). Systems depend on slaughter equipment and slaughter speed.²

In poultry, current practices include manual restraint, shackling live birds and placing live birds in slaughter cones prior to slaughter. Most concerns have been expressed with the practice of live bird shackling.³ Nevertheless, some modern shackle lines are designed to accommodate birds of various sizes and new methods of restraint are being sought to phase out live bird shackling.⁴

RECOMMENDATIONS

RUMINANTS

1. Animals must be restrained only when slaughter can be performed without any delay, and it must be performed without any delay.

-
1. See, Holleben et al., *Report on Good and Adverse Practices: Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences*, pp. 22 ff.
 2. Ibid., pp. 26 ff.
 3. Normative Shechita practices precludes live birds from being shackled.
 4. See, Holleben et al., *Report on Good and Adverse Practices: Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences*, pp. 27, 29, 45.

2. The restraining device, including both the body and head restrainers, or method must suit the size, species and type of animal slaughtered.
3. Due care must be taken during loading the animal into the restraining system to minimize stress and injury. Effort should be made to avoid use of any electric prods. The restraint device and surrounding area must have adequate lighting (lighting should be designed to encourage animals to naturally enter the restraint device), flooring should be non-slip and the parts in contact with the animal should have smooth, rounded surfaces. These surfaces should be inspected at least daily to ensure that worn-out and protruding parts are replaced promptly.
4. All restraining devices should use the concept of optimal pressure. The device must hold the animal firmly enough to facilitate slaughter without struggle or undue delay. Excessive pressure that would cause discomfort to the animal should be avoided. All moving parts of the restraint device should have a smooth, steady movement and jerky motion should be avoided. All mechanized parts of the restraint apparatus that press against the animal should be equipped with pressure limiting devices that will automatically prevent excessive pressure from being applied to the animal. Optimal pressure might be assessed by the absence of struggling behaviour and vocalization during the restraint, and the absence of any injuries and bruises caused by the restraining method.
5. The head restraint must be such that it provides good access to the neck for effective neck cutting and bleeding out and it must be such that it is set with the proper amount of neck tension to optimize slaughter.
6. The head restraint must be designed to avoid mechanical stimuli (such as physical contact or scraping) and chemical stimuli (such as contamination with stomach content) on the surface of the wound during the conscious period that would be assessed according to Recommendation 4 of the 'Post-cut Management of Animals Slaughtered without Stunning' section (Chapter 4).
7. The design of the head restraint must not obscure the front of the head and should also allow good access to the eyes to check for signs of reflexes and sensibility and must not obscure the front of the animal's head.
8. When rotary pens are used, the head of the animal must be restrained before the start of the turning process. The turning operation should proceed smoothly and quickly without interruption to reduce as much as possible the period of animals being restrained in unnatural positions.
9. To restrain the head of cattle, ropes could only be used if slaughter speed is very slow (e.g. maximum of four animals per hour) as long as it is ensured that cattle are handled with necessary care.
10. During neck cutting, the head of sheep and goats (and small calves) may be stretched manually in addition to the mechanical restraining of the body. However, to maximize blood loss and minimize mechanical impact (scraping or touching) on the wound following the cut, until the animal is unconscious, it is recommended that the head continues to be supported during the early stages of bleeding.
11. When using an upright restraint for cattle the belly plate, if used, must be operated according to the concept of optimal pressure to support the animal without lifting it off the ground.

12. During bleeding, the animals shall be held secure but as relaxed as possible, e.g. the head holder and rump pusher should be partially released immediately after the throat cut but not to an extent where blood flow is impeded.

POULTRY

13. Except for small birds, the preferred restraint method is for one person to hold the bird whilst the slaughterperson performs the cut.
14. The restraining device or method must suit the type, size and species of the animals being slaughtered (e.g. the size and design of shackles and cones must be appropriate).
15. The time of shackling poultry before stunning as well as the time of shackling poultry before neck cutting without stunning should be kept to a minimum (maximum one minute). The use of blue lights and a breast comforter to calm the animals during shackling is highly recommended.

3

NECK CUTTING WITHOUT STUNNING

MAIN OUTCOMES

Incision of the neck tissues can result in noxious stimuli that can be perceived as pain in conscious animals. However, the issue is controversial, as there are differences in cutting method and variations in the times to loss of brain function between reported studies. In addition, wounds or actions that involve scraping of exposed tissues, large or multiple cuts are more likely to elicit pain sensation.⁵

RECOMMENDATIONS

1. The slaughterperson must be ready to perform the cut before the animal is restrained.
2. The neck cut must be performed without any delay.
3. Both carotid arteries and both jugular veins must be cut without touching the bones of the spine (vertebrae) with the knife.
4. Each animal should be neck cut by a single swift or continuous back and forward movement of the knife without interruption.
5. The knife used must be sufficiently long for each type of animal to minimize the need for multiple cuts. Ideally, the length of the knife blade should be at least twice that of the width of the animals neck.
6. The knife must be sharp for each animal. The knife should be checked by the slaughtermen (or Shochetim for Shechita) as frequently as required for nicks and bluntness and sharpened accordingly. Emphasis on training slaughterpersons to improve their knife sharpness is recommended.
7. Neck breaking must not be performed together with the cut.

5. See, Holleben et al., *Report on Good and Adverse Practices: Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences*, pp. 4 ff., 30 ff.

POST-CUT MANAGEMENT OF ANIMALS SLAUGHTERED WITHOUT STUNNING

If not pre-slaughter stunned, the animal becomes unconscious when brain perfusion becomes insufficient after the neck cut.⁶ The time taken for unconsciousness to supervene varies between animals.

Some studies on neck cutting in cattle have shown that delays in time to loss of consciousness can vary from a mean of 20 seconds (sd $\pm$ 33) to up to more than 120 seconds in exceptional cases.

Most sheep and goats seem to lose consciousness within 2 to 20 seconds after ventral neck cutting, but sheep can show signs of recovery for longer times in exceptional cases. Most chickens lose consciousness after between 12 and 15 seconds, but signs of recovery/ consciousness are possible for up to 26 seconds after the cut.

However, as time to loss of consciousness varies between animals, clinical signs are necessary to recognize unconsciousness.

Several clinical signs have been suggested to recognize unconsciousness:⁷

- Complete loss of posture.
- No attempts to regain or to retain upright body posture.
- No reactions (e.g. retraction) to mechanical impacts on the wound (e.g. contact of the wound to parts of the headholder or pen).
- Absence of tracking by the eye of movements in the vicinity often accompanied by spontaneous closure of the eyelid.
- Absence of response to threatening movements (e.g. rushing the hand towards the eyes leading to closing of the eyes or moving the head backwards does not occur).

These are the clinical signs of brain death:

- Permanent absence of cardiac activity (e.g. pulse or heart-beat) when bleeding has ceased.
- Permanent absence of brain stem reflexes such as pupillary light reflex, corneal reflex, rhythmic breathing and gagging.

6. See, Holleben et al., *Report on Good and Adverse Practices: Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences*, pp. 13, 14 ff, 33 ff.

7. *Ibid.*, pp. 9, 10 ff., 35 ff.

RECOMMENDATIONS

1. There must be no interference with the wound until the animal is unconscious, except for procedures involved with checking the adequacy of the cut. Mechanical and chemical stimuli on the wound must be minimized.
2. The cut should be inspected carefully for complete sectioning of both carotid arteries and both jugular veins, and for the efficiency of bleeding through the strong flow and seeing the pulsating effect of the heart-beat on this flow. When inspecting the wound, unnecessary contact with the severed edge of the skin must be avoided. Thus, visual inspection is preferable. It is understood that at times, the shochet may have a religious responsibility to carry out a physical inspection on the cut, and a visual inspection will not suffice. If the inspection is done by the shochet, they need to be trained to minimize or totally avoid touching skin surfaces.
3. The animal must be assessed to be unconscious by the slaughterpersons (or the shochet) before it can be released from the restraint. It is suggested that the signs of unconsciousness are checked at least twice, for cattle between 30 and 40 seconds post-cut, and for sheep and poultry between 15 and 25 seconds post-cut. The following clinical signs should be used as a guide for monitoring:⁸
 - No attempts to regain or retain upright body posture.
 - No reactions (e.g. retraction) to mechanical impacts on the wound (e.g. contact of the wound with parts of the headholder or pen).
 - Absence of tracking by the eye movements in the vicinity often accompanied by spontaneous closure of the eyelid.
 - Absence of response to threatening movements (e.g. rushing of the hand towards the eyes leading to closing of the eyes or moving of the head backwards does not occur).
 - No wing flapping in poultry.
4. In the event of inefficient bleeding or prolonged consciousness being exhibited during repeated checks after neck cutting, animals should be stunned with a suitable method as soon as possible, even if this requires the religious authorities to declare the animal as non-kosher or haram. Optimally, this should be done within 45 seconds post-cut for cattle, or within 30 seconds for small ruminants and poultry.
5. As prolonged consciousness is an indicator of poor procedures, in the event of prolonged consciousness, the problem should immediately be investigated and necessary corrective action taken. Records of failure should also be documented for monitoring purposes.
6. Further dressing or scalding or electro-stimulation shall only be performed after brain death of the animal has been verified as indicated above.

8. See Council Regulation (EC) No. 1099/2009 of 24 September 2009 on the protection of animals at the time of killing, Art 5 , 2: 'Where, for the purpose of Article 4(4), animals are killed without prior stunning, persons responsible for slaughtering shall carry out systematic checks to ensure that the animals do not present any signs of consciousness or sensibility before being released from the restraint and do not present any sign of life before undergoing dressing or scalding'.

7. When the cut is performed in a 180° inverted position in cattle, it may be preferable to turn the box to a position between 180° and 90° directly after the cut for better access to the head of the animal and a more relaxed position.

REVERSIBLE STUNNING⁹

MAIN OUTCOMES

Effective stunning before slaughter induces unconsciousness in animals.

Stunning for religious slaughter requires animals to be alive at the time of slaughter. Reversible stunning methods induce temporary loss of consciousness and rely on prompt and accurate neck cutting procedures (bleeding out) to cause death.

After effective stunning, the presence of a heart-beat can indicate the reversibility of unconsciousness if the animal is not slaughtered.¹⁰

RECOMMENDATIONS

1. The animal must be introduced in the restraining device only when the slaughterperson is ready to stun the animal, and stunning must be performed without any delay.
2. Correct stunning should induce loss of consciousness without pain before, or at the same time as, the animal is slaughtered.¹¹
3. The criteria for monitoring the loss of consciousness need to be applied according to the stunning system and species, to ensure that the animal does not present any signs of consciousness or sensibility in the period between the end of the stunning process and death.

*Signs of a successful mechanical stunning in ruminants:*¹²

- Immediate collapse.
- Immediate onset of tonic seizure (tetanus) lasting several seconds.
- Prompt and persistent absence of normal rhythmic breathing.
- Loss of corneal reflex.

9. When accepted by the religious authority.

10. See Holleben et al. (2010) *Report on Good and Adverse Practices: Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences*, pp. 41, 47, 51, 52.

11. Ibid., pp. 39 ff.

12. EFSA (2004) Welfare aspects of animal stunning and killing method, in: *Scientific Report of the Scientific Panel of Animal Health and Welfare on a Request from the Commission*. Question. 15th June 2004. Brussels, Belgium. Published online <http://www.efsa.eu.int/science/ahaw/ahaw_opinions/495/opinion_ahaw_02_ej45_stunning_report_v2_en1.pdf>.

*Signs of a successful mechanical stunning in poultry:*¹²

- Immediate collapse (this may not be applicable to poultry restrained in a cone or shackle).
- Immediate onset of tonic seizure (tetanus).
- Severe wing flapping due to damage to the brain.
- Prompt and persistent absence of normal rhythmic breathing.
- Loss of corneal reflex.

Signs that indicate ineffective stunning include flaccid muscles immediately after stunning, return of rhythmic breathing and rotated eyeballs (in ruminants).

*Signs of a successful electrical stunning in ruminants:*¹²

- Immediate collapse of free-standing animals (not applicable to animals held in a restrainer conveyor).
- Immediate onset of tonic seizure (tetanus) lasting several seconds, followed by clonic seizure (kicking or unco-ordinated paddling leg movements).
- Apnoea (absence of breathing) lasting throughout tonic-clonic periods.
- Upward rotation of eyes.

*Signs of a successful electrical stunning in poultry:*¹²

- Immediate collapse of free-standing animals (not applicable to poultry restrained in a cone or shackle).
- Water bath electrical stunning leads to an immediate onset of tonic seizure (tetanus), followed by short duration clonic seizure (kicking or unco-ordinated paddling leg movements).
- Head-only electrical stunning leads to clonic-tonic convulsions (a reverse of the sequence seen in red meat species).
- Apnoea (absence of breathing) lasting throughout tonic-clonic periods.

Indicators of ineffective stunning are escape behaviour often with vocalizing, absence of the typical tonic or clonic muscle activity, resumption of rhythmic breathing, vocalization during and after the current application or righting attempts and eye tracking of movements often with spontaneous blinking after the current application.

In poultry, return of eye reflexes and rhythmic breathing are useful indicators of the early return of brain function after electrical stunning. During bleeding, vocalization and wing flapping must be absent as well as head raising, spontaneous blinking and eye tracking of movements.

*Signs of a successful stunning with gas mixtures in poultry:*¹²

- Dilated pupils.
- Absence of corneal reflex.
- Absence of rhythmic breathing.
- Absence of response to comb pinch.
- Complete relaxation of carcass.

Indicators of ineffective stunning include righting, wing flapping, vocalization or rhythmic breathing during bleeding.

4. Animals must be checked for the signs of unconsciousness before and after neck cutting.
5. The heart function can be recognized from the pulsating¹³ flow of the blood and the rate of blood loss when the cut is made.
6. The stun–stick interval must be sufficiently short to induce death through blood deprivation in the brain before the animal recovers from the stun.
7. Animals showing signs of consciousness following stunning need to be effectively re-stunned without any delay, using an appropriate back-up method.
8. Non-stuns, or mis-stuns, should be recorded. Management should monitor and take action if non-stuns or mis-stuns occur.
9. The equipment used for stunning should be maintained, regularly tested, and operated properly in accordance with the manufacturer’s recommendations, in particular with regard to the species and size of the animal, and a back-up stunner should be available.

13. Except in poultry.

6

POST-CUT STUNNING¹⁴

MAIN OUTCOMES

Post-cut stunning shortens the time to unconsciousness, i.e. the time when the animal can feel anxiety, distress and/or pain as a result of restraint or neck cutting.¹⁵

RECOMMENDATIONS

1. Post-cut stunning should be performed immediately and at the latest 5 seconds after the neck cut, without further manipulation of the animal between the cut and the stunning application (except if manipulation is required to enable relaxed bleeding position).
2. When a post-cut captive bolt stun is used, the gun must be placed in the correct position using the correct captive bolt/cartridge combination for that animal type.
3. Post-cut stunning must induce immediate loss of consciousness.

14. When accepted by the religious authority.

15. See See Holleben et al. (2010) *Report on Good and Adverse Practices: Animal Welfare Concerns in Relation to Slaughter Practices from the Viewpoint of Veterinary Sciences*, pp. 53 ff.

AREAS REQUIRING FURTHER RESEARCH AND DIALOGUE

Based on the experience gained during the DIALREL project, the following areas have been highlighted to show where policy and research priorities should be directed. DIALREL recognizes the importance of this research being transparent and having the active involvement of members of the religious community, particularly those with scientific, medical and veterinary backgrounds, from the very conception of the research. DIALREL also recognizes the need for such research to include the involvement of key scientists in non-EU countries.

General:

1. Development of a standardized methodology for the assessment of all risks during religious slaughter (health and safety risks and animal welfare risks).
2. Development of criteria for the assessment in a practical way that the animal is alive at the point of slaughter for every species.

Restraint:

3. Alternative restraint methods to live bird shackling.
4. Optimum restraint methods for large animals such as cattle.

Neck cutting without stunning:

5. Further research on pain perception during neck cutting.
6. Best position in the neck for the cut, including effects on carotid occlusion and differences in vascularity and innervation in different regions of the neck.

Post-cut management of animals slaughtered without stunning:

7. Practical indicators for loss of consciousness for each species.
8. Identification of procedures that avoid contact from the cut surfaces of the neck to chemicals (e.g. blood), environmental irritants (e.g. air flow) or equipment (e.g. the front plate or the restrainer).
9. Impacts of delayed loss of consciousness, e.g. delayed bleeding in sheep and poultry.

Reversible stunning:

10. Reasons, frequency and severity of ineffective stunning, including animal welfare risk assessments associated with existing stunning systems.

Post-cut stunning:

11. Further dialogue and research is required between religious authorities and the scientific community to address the risk of post-cut stunning causing non-compliance with religious slaughter criteria.
12. Further research and dialogue on the possible maximum time intervals between the cut and the stunning application by species and slaughter method and system.
13. Further research is needed to make sure that post-cut stunning does not affect brain function and bleed-out to the dying animal.

APPENDIX

COMMENTS AND DISSENTING VIEWS OF THE STAKEHOLDERS TO THE TEXT

European Board of Shechita (EBS) - Bureau Européen pour la Shechita (BES)

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To Mrs Mara Miele, co-ordinator
and the members of the
Dialrel team

Dear all,

We received the last version of your "outcomes and recommendations to good animal welfare practices during religious slaughter".

Shechita is since thousands of years the way of slaughtering animals in accordance with Jewish religious rites and from the beginning on has always been the pioneer and the fore fighter for the welfare of animals.

However, times and techniques are changing and we have always been open for improvements in this field. Of course all improvements have to be compatible to the letter and the spirit of the religious prescriptions.

Apart from two exceptions, free countries worldwide respect the freedom of religion and human rights and guarantee the possibility of performing Shechita on their territory.

Your report makes important recommendations for improvement of animal welfare and that's why we can only congratulate you for this tremendous scientific work. We hope that it will become in the near future an important reference for all European countries and outside of Europe.

Our discussions for preparing of this final version were sometimes difficult but always with mutual respect and a real goodwill to find creative solutions for complex problems. We hope that similar meetings will also take place in the future and will help to clear some misunderstandings and biased attitudes.

However we can't ignore the fact that this project is not based on new scientific research. Most of the data's are based on previous (recent and less recent) literature and research of other scientists. For such an important institution as the European Union it should be much more contemporary

May be this report will be a trigger for further investigation and objective research in this important sector.

It goes without saying that the Jewish community can't agree with all the decisions of your report. If most of them are indeed correct and realistic, it's clear that some of the decisions , even few in number, are only based on feelings and suggestions and have therefore no scientific base.

For some problems we found a solution, but for other essential ones even ultimate creative efforts couldn't solve them.

Since the edition of the final version has already been postponed a few times, we don't find it advisable to reopen the discussion and to enumerate all the controversial items.

However as mentioned before, we hope that we will have the occasion to meet again and continue this important work for both the sake of animal welfare and the religious freedom .

Best regards,

Albert Guigui	Pinkas Kornfeld
Conference of European Rabbis	Chairman Jewish Orth.Community
Chief Rabbi of Brussels	Antwerp
Co-chairman	Co-chairman

Bruno Fizon
Chief Rabbi of Metz
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15th September 2010

Dear Dr Miele,

DIALREL

With regard to Dialrel's document "Main Outcomes & Recommendations to Good Animal Welfare Practices During Religious Slaughter", which you have published as part of your project known as "RELIGIOUS SLAUGHTER: IMPROVING KNOWLEDGE AND EXPERTISE THROUGH DIALOGUE AND DEBATE ON ISSUES OF WELFARE, LEGISLATION AND SOCIO-ECONOMIC ASPECTS", it is very clear from the finished document that you have not followed your stated objectives to have a "dialogue". You have spoken, expecting us to listen, but you have not heard anything that we have said. In fact, you have not been honest with us.

You did agree to certain of our points in meetings with us, but then reneged on those agreements with each draft that you produced.

Specifically, at the Brussels meeting our delegation was clear that the condition of our continued involvement was a complete dissociation from any recommendations of the science and ethics reports. This you accepted at the time but then you reneged on that agreement in the subsequent circulated draft.

Therefore, we cannot endorse your document. Dialrel has made recommendations that completely override the requirements of Shechita and impinge on the religious integrity of its practice.

The document claims that it "does not aim to discuss religious rules", it then proceeds to do exactly that, without any of the authors having understanding or knowledge of the principles of Shechita. By Dialrel's own admission more research is needed on major issues of slaughter generally and religious slaughter in particular.

Recommendations cannot be made, if based on insufficient knowledge.

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Furthermore any recommendations for the improvement of animal welfare practices must not presume that religious slaughter (specifically Shechita) is incompatible with the principles of animal welfare, which this document clearly does.

Your recommendations are an interference and indeed an impertinence without a basis in science or indeed common sense and seem to us an attempt to seek the abolition of Shechita. Perhaps that was your *raison d'être*, which might explain why all our input has been ignored.

Therefore, only recommendations for improvements from those whose intention is the continuation and protection of Shechita can be recognised as unbiased and predicated on the basis of full understanding and compatibility with the religious principles of Shechita.

As such, we cannot be a party to your agenda-based exercise as it is now evident that you never believed in "dialogue" and attempted to use our meetings simply to give the illusion of "dialogue" in order to fulfill the terms for Dialrel's continuing existence.

Dialrel's highly selective interpretation of questionable data seems only a means to pursue an agenda rather than reflecting an interest in either truth or animal welfare and serves only to secure public funding to support your group's cynical aims.

We intend copying this letter to all relevant EU directorates, MEPs and commissioners.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Stuart D. Rosen", with a horizontal line underneath.

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Nizar Boga BSc LL.B(Hons) DMA FRSPH MCIEH JP
Member of Dialrel Advisory Board.

I would like to say that I am grateful to have been invited on your Advisory Board and hope that this will continue as there seems to be a suggestion that further research needs to be carried out. My first suggestion is that the report should give due regards to those who are officially on the AB by mentioning their names. Among the three from London only Dr Shafi's name appears. Perhaps you will make necessary amendments.

I also find that some of the further works of research mentioned is not necessary or at best of very minor significance. Those reading the report and wishing to implement might be persuaded to wait until after these further researches are done. Regrettably in the meantime the animal welfare is compromised especially as this project has already taken 3 years which is more than enough to make determined decisions for the benefit of animals now that the opportunity avails. I would also like to suggest that some of the implementation time in the modifications in slaughter houses and practices could be shortened so we can see and feel the progress. Furthermore suggestion of future research could delay matters still further if the EU finds themselves cash strapped as most member states are already feeling the strains of poor economic climate.

Rizvan Khalid

Executive Director

rizvan@euroqualitylambs.co.uk

Euro Quality Lambs Ltd

Largest muslim owned lamb abattoir in UK slaughtering stunned & unstunned for UK & Export

Dialrel Project & Report Response Statement

This is a response statement to the DialRel project and the final DialRel report on 'Good Animal Welfare Practices during Religious Slaughter'.

Firstly I congratulate the Commission for undertaking the DialRel project. It is crucial to have good dialogue between the religious and animal welfare community so that misconceptions can be addressed, issues identified & discussed and a path forward charted. What has come out of the DialRel project is a starting point which has identified some of the current issues and highlights the urgent need for better understanding, further research and intelligent debate. To this extent the Commission should be commended.

Here are some general points to state in relation to the DialRel project.

- The project had a low-key start and a good finish but there was much lacking during the middle crucial research phase. Religious representatives needed to be kept in the loop from the start of the project so considered thought could have been given during its life. This project was only well communicated & dialogued in 2010 when much of the research had already taken place.
- There was little dialogue with local European religious scholars and instead there was dialogue with scholars from Al-Azar in Egypt at the very end. There are many European religious scholars and they should have been approached early on.
- It must be recognised that the halal market is not one homogenous market, particularly in relation to stun/nonstun. Some Muslim consumers accept stun whilst others do not – but all muslims accept nonstun. The halal standards from Malaysia, GCC, OIC, Brunei and Thailand all state that the unstunned method is the preferred way of religious slaughter.

More constructive engagement with various key segments of the community would have resulted in a more robust process. Due to lack of continual engagement there have been allegations of bias voiced from within the Muslim community at some of the project outcomes.

In specifically addressing the report on 'Good Animal Welfare Practices during Religious Slaughter I would like to make the following points (all points have been made during the course of the project).

- The report's scope excluded an assessment of religious criteria of slaughter. Without listing the respective religious criteria and assessing the risk of non-compliance of said criteria it is impossible to adopt a holistic approach to the religious slaughter of animals. It allows individuals to adopt the religious criteria

that they see fit without complete transparency & awareness of the criteria, including any compliance issues and how these can be communicated for the benefit of consumers.

- A holistic approach to religious slaughter means religious slaughter can be managed in line with standard principles of risk assessment. There is a need to identify, categorise & prioritise risks on a species by species basis since each specie generates a different outcome following a risk assessment. There are 3 principle risk categories from which all other risks can be sub-divided. These are
 1. Risk of non-compliance with religious criteria (belief specific)
 2. Risk to health & safety (animal, process & operator specific)
 3. Risk to animal welfare (specie specific)
- Although religious requirements were outside the scope of the report they were referred in the document in 2 sentences. These sentences were, rightfully, included to give meaning & context to the scenario. Their inclusion re-emphasises the fact that all religious slaughter criteria should have been included within the report to generate awareness of the criteria & provide context.
 - Under **'Post-cut management...'**, recommendation 2, *'It is understood that at times, the shochet may have a religious responsibility to carry out a physical inspection of the cut, and a visual inspection will not suffice.'*
 - Under **'Reversible stunning'**, **'Main outcomes'** it says *'Stunning for religious slaughter requires animals to be alive at the time of slaughter'*.
- There needed to be clear recognition, where the main issue is surrounding the use of stunning or non-stunning, that there are good stun practices and good non-stun practices and the objective of the report is to raise standards in all practices. This particular point was not emphasised.
- The report is heavily focused on cattle slaughter and uses bovine observations/research to infer guidelines for other species. This in itself is poor application of science.
- Religious slaughter guidelines in relation to poultry are wholly inadequate in the report due to the low numbers sampled. The fact remains that many more thousands of poultry are slaughtered for the religious community in comparison to the few numbers of cattle yet no acknowledgement of that has been made.
- Under **'General outcome & recommendations'** the paragraph beginning *'One person should be designated...'* should read *'One person should be designated within the organisation as being the responsible person...'* not *'... within the religious authority'*. The recommendation was that every slaughterhouse should have a designated person responsible for religious slaughter compliance and animal welfare (combined).

Feel free to contact me to respond to the points raised. I hope you take these comments onboard when assessing DialRel and deciding future actions. I look forward to working with the Commission to satisfy the needs of the religious consumer whilst optimising welfare concerns.

THE MUSLIM COUNCIL OF BRITAIN



**Comments on Dialrel document:
Main outcomes and recommendations
to good animal welfare practices during religious slaughter**

There is much that is wrong in the slaughter of animals for food – both by religious and non-religious methods - that compromise animal welfare. Requiring the stunning of animals for religious slaughter will not end animal welfare problems; but removing bad practices both in religious and non-religious slaughter will. Let us take a holistic view of improving animal welfare and suggest ways of reducing mis-stuns, and repeat stuns, let us stop shackling of live animals like sheep and cattle, let us improve methods of restraining poultry. Let us engage with religious scholars when it comes to aspects of religious slaughter; let us create conditions and circumstances that inspire confidence in the consumer that what is described as halal is in fact so.

It is in this spirit that we participated in discussions about animal welfare despite being invited only towards the end of the project, but major concerns remain.

The responsibility to treat animals properly is an ethical responsibility. All of us involved in animal care and animal husbandry must always take it seriously. Animal welfare should be addressed in the overall context of the life experience of farm animals – from breeding, to on-farm life to slaughter as well as immediately post-slaughter until death occurs. The prescribed process for the Muslim method of slaughter, *Dhabah* provides a holistic approach to animal welfare. There is much that needs to be improved in terms of animal welfare at the farm and at the time of slaughter – both for animals subjected to religious and to non-religious slaughter methods. These welfare concerns must be addressed in an objective manner.

The European Food Standards Authority (EFSA) report¹ published this month clearly identified several factors that demonstrate that chicken breeding in Europe is a major poultry welfare concern. It has highlighted rapid growth that leads to a higher prevalence of lameness and other painful injuries; the use of severe and painful mutilations without providing pain relief; barren environments; high stocking densities that negatively affect animal behaviour patterns; and unsuitable slaughter lines that create additional and

¹ <http://www.efsa.europa.eu/en/scdocs/doc/1670.pdf> (Accessed 26th August 2010)

unnecessary stress injuries. There is an urgent need for stronger regulation, legislation and urgent action based on sound scientific evaluation of the problems and their solutions.

The DialRel guidance is too narrow in its scope. By focusing disproportionately on the specific component of the slaughter it does not do justice to several other important factors that have a strong influence on the welfare of animals under these circumstances such as equipment design, handling of animals just prior to the actual slaughter, particularly the manner in which the animals are presented for slaughter, specifications of the skills of both the operators and others involved in the process, and how the integration of all these factors for the benefit of the animals can be achieved and monitored.

The role of the slaughter man in achieving good animal welfare at the time of slaughter is very critical. There should be clear guidance for the training of slaughter men. The elements of the training programme should highlight the responsibilities that fall on the slaughter man. Religious scholars / authorities must be integral to the training process. The Muslim Council of Britain supports the need for the religious authorities to participate in the training programme and recommend a system of renewal of the licences at a reasonable interval (e.g. 5 years). This licensing approach should also be extended to practitioners (both those doing the stunning and those doing the sticking for non-religious slaughter).

The term 'reversible stunning' describes a process that does not lead to the death of the animal and if left undisturbed will result in the animal regaining consciousness. Criteria for ascertaining that the animal is not conscious (although incorrectly stunned) or that it is not recovering (because of a delay in slaughter) have been well described. The slaughter man must be trained to detect signs of consciousness and ascertain viability of the animal at the time of slaughter. Criteria to assess successful 'reversible stunning' are not given and despite requests for this information the issue is not addressed in a meaningful way. There is passing mention that observing a pulsating heart serves the purpose of ascertaining that the animal is alive. The practicality of ascertaining this in a high throughput slaughter house needs to be evaluated. Furthermore this recommendation is valid for cattle and sheep, but these animals only account for 0.04% and 6.1%, respectively, of the animals that are halal slaughtered. The document states that observing the pulsating heart is 'not applicable' to poultry that account for 93.8% of halal slaughtered animals. It seems that the scientific community is unable to provide objective criteria on how this important Muslim slaughter requirement will be met. Since the 'reversibility' of the stunning process cannot be guaranteed in the case of poultry, there is a need in the interest of transparency and of permitting an informed choice by the Muslim community in general and Muslim scholars in particular to inform them of this issue as a matter of urgency.

The project focused on the slaughter of cattle, sheep, goats and poultry (mainly chicken and turkeys). However, there is a mismatch between the detail nature of recommendations for mammals and the absence of equivalent details for poultry - the category of animals most affected. The paucity of recommendations and advice on criteria to ascertain reversibility of electric stunning in poultry is unacceptable.

Post-cut stunning is intended to hasten the death of the animal; it is not reversible and NOT accepted by almost all of the Muslim community. Post-cut stunning is not used in the UK (MHS report, 2003). A pre-requisite for halal slaughter is that the animal should die from the cut and not from a blow or other physical action. Post-slaughter stunning does not, therefore, meet the *Dhabah* criteria. Inclusion and consideration of the religious requirements for slaughter, as stated above, would have made that obvious.

The advent of the Dialrel Project was presented as an opportunity to improve communication between the scientific and religious communities, improve understanding of the issues, remove misconceptions / misinformation surrounding religious slaughter. It was meant to provide a basis for improving animal welfare during religious slaughter regardless of the particular method of religious slaughter practiced, so long as it operates within the basic legislative framework of the country. In our view these objectives have not been achieved because of the failure of the scientists on the DialRel project to actively engage in meaningful dialogue with the religious communities and consumers. The earlier steps are identical to those used in non-religious slaughter – and the same problems may occur, but this document fails to recognize this congruence.

The absence of any critical review and equivalent concern for improving regular slaughter despite reports of animal welfare compromises² also speaks of the misdirection of this effort. The document fails to decouple the role of equipment, the role of humans both from the religious community and otherwise, and the role of management in sorting out all aspects of slaughter.

We need to address the issues using rational arguments and reasoning. Religious slaughter needs to be fairly evaluated. This process to date has not done that. We are particularly disappointed that being an EU project Dialrel did not avail itself of the opportunity to learn from, discuss or engage with Muslim scholars³. The process has not helped to build trust between Dialrel and the Muslim community.

Shuja Shafi
Chair, Food Standards Committee
The Muslim Council of Britain

August 2010

² The Myth of Humane Slaughter – An Animal Aid Investigation,
http://www.animalaid.org.uk/h/f/CAMPAIGNS/blog//4//?be_id=211 Accessed: 18th October 2009

³ http://www.halalmc.net/pdf/HMC%20Ulamah%20Report_FINAL_lr.pdf

A Votre Service

AVS's commentaries about Dialrel report

First of all, it is important for us to specify that we agree with a large part of the recommendations suggested by the Dialrel report. These recommendations have –for the majority of them- been published in France by different veterinary or animals protection authorities.

Welfare Concern

In our first report sent to the Dialrel's member, we focused one idea. Removing bad practices both in religious and non-religious slaughter should be our project. But, we must admitted both (supporter and opponent of stunning) that we should make effort to improve slaughter practices.

Some recommendation could help in this way. For example we suggested that slaughter has to be conditioned by the use of fixation or immobilisation material, including for poultry. Also, we purposed to forbid slaughter of species using a setting box provided for other species and thus unupdated. In the case of ritual slaughter we must impose training for the ritual slaughtermen, integrating the minimal knowledges and practices in terms of animal welfare. These slaughtermen will have to be evaluated according to their skills every 5 years to a minimum. Etc..

Stunning specific issue

The preface of the report « Animal Welfare at Religious slaughter » expressed that: “ *there is a continuing debate on the merits and possible adverse effects of preslaughter stunning in general.*”³ Indeed, before any debate on the effects of slaughter without stunning, it seemed necessary to study the soundness of stunning.

Yet, in spite of this wish, the different recommendations will all go in the sense of restricting at a maximum slaughtering without stunning. We have overshadowed the many criticisms of scientists, showing up adverse effects

of stunning methods, and specifically electronis. The thesis challenging the well-founded of stunning has not been evaluated.

Thus, despite the important number of thesis advocating the ritual slaughter without stunning and its benefits, very few lines are dedicated to it in the different reports and any one in the final report.

Religious slaughter

Suffering is what is at stake in this debate. Let us recall that *“it is established that the relation “lesion-pain” is not always systematic, there are pains without lesion and lesions without pain. Moreover, pain is not only linked to the importance of the body damage”*.⁷ Thus, ritual slaughter is not necessarily synonymous with a harder pain because the animal is conscious before bleeding.

It is also interesting to notice that ritual slaughter is often put into question for the way it is applied on the fieldwork, and this is something that we cannot deny, even if the criticisms can be as virulent concerning the practice of stunning, and specifically in the case of poultry, as confirmed by EFSA or INRA report's. In our report we confirmed that 90% of French ritual slaughter is doing after electronis. So, why focusing so much in the remaining 10%, while there is an important problem of animal welfare for the top 90%.

At last, putting religious requirement outside the scope of the report was not a so good idea, because the bases of religious slaughter are religious requirement.

Our objective is to remind that beyond the freedom of religion, there is a genuine debate on the way to practice slaughter in the best way. We wish that it could be the preamble to any other dialogue. As we (as a religious organisation) accept the idea that stunning could prove to be preferable for the animal, even if to this day researches do not allow to assess it in a certain way, our interlocutors should recognize that the ritual slaughter could be preferable.

Reversible Stunning

Reversible stunning is the most important part of the document by its size and the debate it raises. However, we don't find time to discuss correctly this part. Also, we understand that it's difficult to take account of all points of view in the document, but most of our comments on this part were not. One of them is very important: Criteria to assess successful of 'reversible stunning'. By successful we mean reversibility. So at least, some condition should be introduced.

The question of poultry is almost hidden, whereas it is central to 3 titles. First, since it is the product the most produced and consumed in ritual, then because the question of reversibility really poses a problem, and finally because poultry is certainly the most neglected species in terms of recommendations of welfare.

There is an important number of parameters that have to be taken into account during the stunning of poultry and which make the implementation of a reliable procedure. Seasons, conditions of transport, species, races, hygiene and the salubrity of the slaughterhouse are crossed conditions to determine the reliability of stunning.⁴³ In spite of this, stunning prior to sacrifice is practiced in 90% of the cases of ritual slaughter in France.⁴⁴

Practically, it is impossible to ensure a 0% of death following stunning. And we want to remember that religious authorities prohibited electrocution on poultry all over the world, from Pakistan to USA, through Saudi Arabia, Egypt, Europe and also the Organisation of the Islamic Conference which includes all Muslim countries.

Fethallah OTMANI

General Manager – AVS

August - 2010

EUROPEAN LIVESTOCK AND MEAT TRADING UNION / EUROPÄISCHE VIEH- UND FLEISCHHANDELSUNION



Brussels, 26th August 2010

O/REF: JLM/zn/sb/**L-105-2010-EN**

RE: DIALREL - Recommendations to good animal welfare practices during religious slaughter/UECBV Position

Dear DIALREL project team,

The European Livestock and Meat Trades Union (UECBV) would like to express its appreciation for the great work done and for the important progress made in the field of promoting dialogue between scientists, religious representatives and stakeholders regarding the issue of religious slaughter practices.

The UECBV would like also to thank the DIALREL project team for the opportunity to take part in the discussions, working groups, conferences and especially in the development of the document "*Main outcomes and recommendations to good animal welfare practices during religious slaughter*".

The UECBV supports the finalized document but would like to underline that there are still some figures where the UECBV questioned their reliability.

Therefore the UECBV supports the continuation of research and dialogue in the areas mentioned in the last section of the document, and will be honored and grateful to be part of them.

Yours sincerely,

Jean-Luc Mériaux
UECBV Secretary General



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Education, Research
and Industry

DIALREL project “Religious slaughter: improving knowledge and expertise through dialogue and debate on issues of welfare, legislation and socio-economic aspects”

FVE statement

FVE wants to thank the coordinators Mara Miele and Haluk Anil and all scientists who worked within the DIALREL project for their enormous work and the dedication with which they did this work. FVE also wants to thank the Commission for sponsoring this important project which hopefully will lead to positive improvements in the future. FVE is grateful for having been selected as member of the advisory board

FVE is of the opinion that slaughter without stunning is unacceptable.

FVE believes that as long as legislation still allows for slaughter without stunning:

- it must be limited to animals exclusively slaughtered for religious customers only,
- post-cut stunning must be given,
- Consumers have the right to know if the products they intend to purchase result from a slaughter without stunning or not.

FVE is encouraged that some progress has been made towards mutual understanding and the importance of minimizing or eliminating distress to animals. We see this guide to good practice during religious slaughter as a first step and we look forward to taking the work on the next stage through further dialogue, research and policy change.

President

Walter Winding

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- August 2010 -

Eurogroup's Comments on Dialrel main outcomes and recommendations to good animal welfare practices during religious slaughter

Background

Dialrel is a European project, started in 2006 and coming to an end in 2010, funded by the European Commission and coordinated by Dr. Mara Miele from Cardiff University. Its main objective was to address issues relating to the practice of religious slaughter and the market and consumers. The principle aims of this project were to explore the conditions for promoting the dialogue between interested parties and stakeholders and facilitating the adoption of good religious slaughter practices. The additional aim was to review and propose a mechanism for implementation and monitoring of good practices.

Introduction

Eurogroup's policy on slaughter is very clear: We are not against religious slaughter but we cannot accept slaughter without stunning. Eurogroup wants **ALL the animals to be stunned before slaughter** as it is already accepted by some Muslim groups in Europe and throughout the world and as it has been accepted by Jewish religious authorities as well in Sweden in the past (1952-1979).

Most of the documents and deliverables produced by the project are of great interest, represent loads of useful data and will **become important references in the future**, especially the *Report on good and adverse practices - Animal welfare concerns in relation to slaughter practices from the viewpoint of*

veterinary sciences,— prepared by K. von Holleben, M. von Wenzlawowicz, Antonio Velarde and collaborators. We do thank all the searchers and scientists who have worked together in this project and we would like to give a special thank you to Dr Mara Miele, coordinator of the project and Haluk Anil who was in charge at the beginning of the research.

Comments :

1) Promotion of the dialogue :

One of the main aims of the project was to explore the conditions for promoting the dialogue between interested parties and stakeholders.

- In fact, since we joined the advisory board of the project in June 2008, **the dialogue has rarely been possible** with representatives of religious authorities, with the exception of some moderate representatives of English, French or German communities. Too often the dialogue was reduced to a simple monologue where no place was left for discussion at all, as nearly every single survey or scientific document was systematically rejected by some religious communities and considered as biased, not reliable, or even anti-Semitic, whereas most of the studies have been carried out by well known scientists or searchers, and peer reviewed.

- It is a pity that very few meetings have been scheduled in the first years of the project (only one in November 2008) as it was a unique occasion to improve exchanges between different stakeholders, to initiate a constructive dialogue and to improve personal relationships.

- **In 2010**, meetings became more frequent as the project was coming to an end, and **real and positive discussions have been able to take place** with nearly all the religious communities represented.

- Now that the project is finished **there is a real danger** that this emerging improved dialogue could collapse and thus compromise the positive results that have been obtained in the last months. Efforts must be made to keep this momentum going.

2) Adoption of good religious slaughter practices:

One other aim of the project was to facilitate the adoption of good religious slaughter practices.

- As the document represents only recommendations, **their implementation is not compulsory nor enforceable**. They will be applied only on a voluntary basis with the risk of having only “good” abattoirs implementing the recommendations while “bad” ones will carry on with poor practices. **A reflexion must be engaged at the EU level** to see how those guidelines could become, at a later stage, part of the new regulation. There should be a **clear commitment of all religious communities** concerned to adopt those guidelines and to ensure that correct practices will be implemented from now on **in all abattoirs** carrying out religious slaughter.
- Another negative point is the adopted paragraph on the attitude following a “missed” religious slaughter (*Section Post-cut management of animals slaughtered without stunning , paragraph 5*) . In this case, where the agony of the animal is prolonged, it is recommended to stun the animal 45 seconds post cut, for cattle, and 30 seconds after, for sheep and poultry. This delay is far too long and is moreover unrealistic, as it is recommended to assess level of consciousness after 40 seconds for cattle. It is impossible for any slaughterman to do this assessment, then to fetch the stunning equipment and to stun properly the animal within 5 seconds!
According to religious authorities, shechita is acting as a “stun” leading to an almost instantaneous onset of unconsciousness. Thus, such a long interval between the cut and the recognition of failure of religious slaughter is not justified. **This paragraph of recommendations is absolutely unacceptable for Eurogroup.**

3) Details of recommendations:

Numerous recommendations listed in the document will help to minimise suffering and pain for religiously slaughtered animals. Even if most of the points are already included in the forthcoming Regulation 1099/2009, their presence in those guidelines **should lead to an earlier implementation** in some abattoirs, instead of having to wait till 01/01/2013, date of implementation of the new regulation.

a) Positive comments:

Eurogroup is considering that some proposed measures, listed below, are especially important and positive:

- recognition of the importance of training of all personnel handling animals, from the unloading point to the slaughter box.
- Designation of a person responsible for checking compliance with religious requirements and optimisation of animal welfare.
- Use of Standard Operating Procedures
- Recommendation for use of upright pens instead of rotating boxes
- Application of the principle of optimal pressure for restraining equipments

- Recommendations for design and use of head restraints
- Eurogroup is opposed to live shackling of birds where animals are suspended upside down, an unnatural position which is very stressful and painful. Thus the recommendation to reduce it to one minute, as a temporary measure pending a ban on this practice, is positive.
- Importance given to the correct size and sharpness of the knife blade
- Instructions for correct cutting movements
- Severance of both carotids and jugular veins
- Listing of signs to recognize unconsciousness after the ritual cut
- Listing of signs to recognize unconsciousness after use of stunning equipment
- Listing of signs to recognize brain death
- Recommendations for inspection of the wound
- No further dressing, scalding, or electro-stimulation allowed before verification of brain death.
- Importance of monitoring and corrective actions
- Listing of areas requiring further research and dialogue

b) Areas of concern:

Some other outcomes or recommendations are of concern to us:

- If some of the points listed above are already part of the Regulation 1099/2009, on some aspects, the Dialrel recommendations are weaker than the legislative text:
 - If training is mentioned, nothing is said on the need for a certificate of competence. (Article 7)
 - No reference is made to the need for ruminants to be mechanically restrained (Article 15 par 2)
 - Forbidden restraining methods are not listed (Article 15 par 3)
 - No reference is made to operating rules in abattoirs mentioned in Annex III paragraphs 1 and 2 of the new regulation.
- There is no clear indication that those recommendations would be applicable to ritual slaughter outwith slaughterhouses (eg Aïd festival)
- Rotating boxes are still allowed to be used.
- The issue of immediate post-cut stunning has not been explored enough.

Conclusions

This document, called "Main outcomes and recommendations to good animal welfare practices during religious slaughter" constitutes undoubtedly **a step in the right direction**, and emphasizes the **need for religious communities to adopt practices that could reduce pain, distress and suffering for animals**.

As long as slaughter without stunning is allowed in the EU, it was important for Eurogroup to show through its participation to the preparation of this document that we are in favour of improving animal welfare by having a constructive **dialogue with the religious authorities and the other stakeholders**, and that **methods used for religious slaughter could be changed or improved to minimise animal's suffering, pain and distress**, which are associated to slaughter without stunning, as confirmed by multiple scientific surveys and by the EFSA opinion published in 2004.

However, despite the positive aspects of some of those recommendations, Eurogroup cannot give its full support to a document which promotes slaughter without stunning.

We cannot support either the adopted recommendation where, if a religious slaughter is "missed", **the animal is left to a prolonged agony before being post cut stunned** after an abnormally long and unjustified period of time.

WP Co-ordinator

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The DIALREL project is funded by the European Commission and involves partners from 11 countries. It addresses issues relating to religious slaughter in order to encourage dialogue between stakeholders and interested parties. Religious slaughter has always been a controversial and emotive subject, caught between animal welfare considerations and cultural and human rights issues. There is considerable variation in current practices and the rules regarding religious requirements are confusing. Consumer demands and concerns also need to be addressed and the project is collecting and collating information relating to slaughter techniques, product ranges, consumer expectations, market share and socio-economic issues. The project is multidisciplinary and based on close cooperation between veterinarians, food scientists, sociologists, and jurists and other interested parties.

EC funded project. N°: FP6-2005-FOOD-4-C: from 1 November 2006 until 30 June 2010.

The text represents the views of the author(s) and does not necessarily represent a position of the Commission, who will not be liable for the use made of such information.

Project Co-ordinator

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