



World Muslim Consumers Organization
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To:

Mrs. Eva-Maria Zamora Escribano, Head of Unit
SANTE G2/SR/rb D(2017) 2002139
European Commission
1049 Brussels, Belgium

Lille, June 12, 2017

Subject: Animal Welfare Consultation: Slaughter without stunning

Copy:

Mr. Anouar KBIBECH, the President of the French Council of Muslim Worship (CFCM)
Mr. Ahmet OGRAS, the Vice President of CFCM
Mr. Aslam TIMOL, the President of the Halal Commission of CFCM
Mr. M. Moulay El Hassan EL- ALAOUI TALIBI, the National Prison Chaplain
Mr. Arbi ABDELKADER, the National Army Chaplain
Mr. Dalil BOUBAKEUR, the President of the Great Mosque of Paris
Mr. Kamal KABTANE, the President of the Great Mosque of Lyon
Mr. Khalil MERROUN, the President of the Great Mosque of Evry
Mr. Joël MERGUI, the President of the French Central Israelite Consistory
Mr. Bruno FISZON, the Great Rabin of Moselle

Also a copy is sent to my colleagues; head of Muslim consumers' groups, Mrs. Ruksana SHAIN (UK), Mr. Taha ZAKI (Belgium) and Mrs. Mariam AARAS (Netherland), and to Dr Shuja SHAFI (Head of the Muslim Council of Britain)

Dear Mrs. Eva-Maria Zamora Escribano,

I enclose for you my contribution, in the name of both ASIDCOM (Association de Sensibilisation, d'Information et de Defense de Consommateurs Musulmans) and WMCO (The World Muslim Consumers Organization), and on behalf of the French National Muslim Prison Chaplain, to the consultation about the welfare of animals subject to particular methods of slaughter prescribed by religious rites. The organizations BEhalal (UK), Ikeethalal (Netherland) and ASEVE Foundation (Association Européenne pour le Vivre Ensemble, Belgium) were

consulted and they accepted to support this letter and our comments on the current consultation about animal welfare. The consultation indicates that the finalized text will be a resource for business operators and EU Member States to use in their efforts to improve animal welfare through training and support for animal welfare officers and slaughterhouse workers. Then, I would like kindly, as a representative of Muslim consumers, to bring to your attention some of the sources of bad practices that occur during the slaughtering of animals supposedly for the Muslim community by European abattoirs.

First, there is often a lack of coordination between the halal market business operators and the representatives of the Muslim worship community. Under these conditions, the workers, particularly the Muslim slaughterers, are directly employed by the abattoirs and lacking any religious studies, training or monitoring of their compliance, which are the requirements of religious slaughter. The results are that they are often in non-compliance with the religious requirements, which at their essence are based on a strong animal welfare ethic.

The exemption from the need to stun animals is to allow for proper Muslim slaughter of animals according to religious tradition. When this is done without proper religious involvement, the spirit of this exemption is violated. And the religious consumer also loses the traceability that comes with properly supervised religious slaughter of animals.

Hence, it is necessary that the documents presented for evaluation during this consultation take into account these conditions and seek to properly return responsibility for religious slaughter of animals to the proper religious authorities. First, the text needs to remind everyone of paragraph 18 and Art. 4-4 of the European regulation n°1099/2009 that clearly defines the concept of the religious slaughter. Second, the role of the religious communities to define, frame and monitor the actual religious slaughter needs to be highlighted. Then, this document needs to carefully avoid making religious judgments that are beyond the competence or role of the consultation. They also need to carefully define the EU secular requirements and not venture beyond.

The French experience suggests that the State officials tend, when they have applied such guidelines for animal welfare, to suggest them as an interpretation equivalent to the regulations.

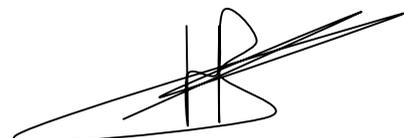
The request for a post-cut stun goes beyond the European legal obligations with respect to the religious slaughter of animals.

To conclude, please kindly consider the follow remarks and suggestions:

- The finalized text will be hard to interpret by those doing the work (business operators and animal welfare officers) unless the consultation is divided into two separate and independent sections and the title of the document is revised to reflect this: (a) The religious slaughter of animals without the use of any other interventions before or after the traditional slaughter; and (b) The religious slaughter with the use of certain methods of intervention prior to or after slaughter. Both of which still will require the acceptance and participation of representatives of the relevant religious communities.
- All of the sections should comply with the spirit of the European regulation n° 1099/2009 by clearly and unambiguously respecting the legal articles and paragraphs that remind everyone of the exemption granted for the religious slaughter of animals.
- The framework for religious slaughter of animal practices (i.e., meeting the particular needs prescribed by religious practices) requires that the religious slaughter practices have to be framed by representatives of the relevant worship communities. They must be involved in assuring that all good practices and SOPs are consistent with religious practice and that they are then in a position to train the religious workforce, to monitor compliance with these guidelines both religiously and with respect to animal welfare, and to assure the integrity of the meat supply for their respective communities (i.e., traceability).
- The nature of any additional restrictions which are established by the member States (Art. 26) is not a matter for the European regulations and should not appear in these European guidelines for animal welfare. By doing so, one risks confusing the users of the final document. For example, the post-cut stun is suggested within the current consultation as a regular obligation in certain cases. Yet, the only requirement in the European regulation is to keep the animal restrained until unconsciousness.

Best Regards

Hanen Rezgui Pizette

A handwritten signature in black ink, consisting of a large, stylized 'H' and 'R' intertwined, with a long horizontal stroke extending to the right.