

Government Buildings, Hook Rise South
Tolworth, Surbiton, Surrey KT6 7NF
Direct Line: 0181 330 8022 (GTN 3836)
Switchboard: 0181 330 4411 Fax: 0181 335 4274



To organisations listed
in the Appendix

AWC 480
31 March 1999

Dear Sir/Madam,

THE WELFARE OF FARM ANIMALS AT SLAUGHTER

1. In its rôle as an independent advisory body to Agriculture Ministers, the Farm Animal Welfare Council (FAWC) has begun a new review of the welfare of farm animals at slaughter.

2. A working group has been set up under the chairmanship of Mrs Jo Turnbull, JP, LIB, and will produce updated advice on welfare at slaughter. The working group will be assisted by representatives from the State Veterinary Service. FAWC has not studied this topic in detail since the mid-1980s and wishes to re-assess welfare at slaughter in the light of, for example, developments in technology and slaughterhouse design.

3. The review will be confined to the welfare of livestock from the time of arrival at the place of slaughter until death. This excludes loading, collection and transportation of animals to the slaughterhouse and all slaughterhouse operations subsequent to death. The study, in the main, will relate to slaughterhouse premises (including unloading, condition of animals on arrival and lairage facilities) but will also take account of on-farm slaughter and slaughter in knackery yards. We will consider species farmed for food, including certain exotic species such as ostrich. However, fish are excluded as our 1996 Report on the Welfare of Farmed Fish dealt with slaughter techniques. Specific technical differences between species will be addressed via appendices to the report.

4. It is usual for FAWC to conduct a consultation exercise at an early stage and my purpose in writing is to seek your organisation's view on the animal welfare aspects of the slaughter process. Please feel free to comment on the strengths and weaknesses of current practices. Whilst the working group will adopt a generic approach to its study, we have identified one issue upon which

seek specific comment. We would particularly welcome information on any aspect of research and development relating to the slaughter of animals, especially if that would enable FAWC to determine priorities for such work.

In addition to this consultation exercise, we may write to some organisations with specific questions as work progresses. Some may also be invited to discussions with the Group. Normally FAWC reports list the names of the organisations that gave evidence. Should you prefer to be excluded from the list, please tell me when you reply.

If you believe there are any important omissions from the list of consultees, I should be obliged if you would let me have the name and address of an appropriate contact.

FAWC thanks you for your co-operation and looks forward to receiving your comments by 1 June 1999 or earlier if possible.

Yours faithfully

David Bower

Bower
Assistant Secretary

CAMPAIGN FOR THE PROTECTION OF SHECHITA

3 Vincent Court, Bell Lane, London NW4 2AN
Tel: 0181 203 4711

Farm Animal Welfare Council
Government Buildings
Hook Rise South
Tolworth
Surrey KT6 7NF

24 May 1999

Ref: AWC 480

Dear Sirs

THE WELFARE OF FARM ANIMALS AT SLAUGHTER

We refer to your letter dated 31 March regarding the consultation exercise being undertaken by your working group.

We represent thousands of Orthodox Jews in Great Britain who are gravely concerned by periodic attempts to abridge their civil liberties and freedom of religious belief and practice in regard to shechita, the Jewish religious-humane method of food animal slaughter.

The method stuns, despatches and exsanguinates in one operation and fulfils all the requirements of humaneness. It is a cardinal tenet of the Jewish faith that the laws of shechita were Divinely ordained to Moses at Mount Sinai. The rules governing the practice of this sacred ordinance have come down to us from time immemorial, and, amongst other purposes, they ensure a swift and painless despatch of the animal. The time-hallowed method of shechita has been a central pillar in the sustaining of Jewish communal life for millennia. Any infringement of the rules or modification of the practice renders the meat unconditionally forbidden to Jews. Since 1928, shechita has been protected by various enactments of primary and secondary legislation. Freedom of religious belief and practice are protected by the European Convention for the Protection of Human rights and Fundamental Freedoms.

Kindness to animals is a core value of Judaism and annexed is a synopsis of Biblical and Rabbinical law on this subject.

Shechita consists of the instantaneous and painless severance of major organs and vessels at the neck producing immediate loss of consciousness and sensation, until death supervenes. It is consistent with all the dictates of humaneness.

/The shochet,

President: Rabbi Neville Kesselman Barrister-at-law
Vice President: Chanoch Kesselman
Rabbinical Advisor: Rabbi Benjamin Vorst
Political Director: Professor Geoffrey Alderman MA DPhil (Oxon) FRHistS FRSA MIQA

The shochet, who performs shechita, must be a person of high moral character and consistent religious practice. He is specially trained for the office, has a thorough knowledge of the precise rules regulating shechita and kindness to animals, anatomy and pathology. His expertise includes the meticulous setting and inspection of the shechita instrument (*chalaf*) to ensure that its exquisite sharpness is maintained for the performance of shechita. He is qualified by examination, certified and officially appointed. He and his instruments are subjected to frequent re-examination by the Rabbinical Authorities. Moreover, a shochet must hold licences granted by The Rabbinical Commission for the Licensing of Shochetim and by the Minister of Agriculture.

[Schedules 1 and 12 to The Welfare of Animals (Slaughter or Killing) Regulations 1995, S.I. 1995 No. 731]

Your letter refers to your last detailed study in the mid-1980's of welfare at slaughter. Your "Report and Recommendations on the Welfare of Livestock when Slaughtered by Religious Methods" [FAWC 1985, Reference Book 262] ignored evidence of the humaneness of shechita. Whilst acknowledging the significant differences between shechita and other religious slaughter methods, your advice for legislation ignored those differences. Your review was manifestly biased and in part misrepresented shechita and constituted an unprecedented attack upon the integrity of shechita as a humane method and a direct threat to the religious freedom of the Jews of Britain. At the invitation of MAFF, the Campaign for the Protection of Shechita submitted comment to Ministers on 29 October 1985.

On 29 October 1987, in rejecting one of your recommendations, Ministers said that the Government had to recognise the serious implications for the religious communities if they were no longer allowed to prepare meat as their faiths required and did not believe it would be justified in imposing such a burden on those communities. Other recommendations were similarly rejected.

You state in your letter that your review will be confined to the welfare of livestock from the time of arrival at the place of slaughter until death and is to exclude all slaughter operations subsequent to death. You said the same about your remit in the mid-1980's yet went beyond that remit by recommending identification and labelling of meat. You thereby manifested bias and were ultra vires your remit. [FAWC 262, Part III Recommendations, Para. 95(n)].

We trust that such bias and misrepresentation will not recur in the updated advice you intend to produce.

Yours faithfully



Rabbi Neville Kesselman
President

Kindness to animals in Jewish law

The Jewish law is called *Toras Chesed* a 'Law of Kindness'. Kindness and humanity are enjoined in it not only toward our human fellow-creatures, but also toward our dumb friends, the lower animals. The right of dominion over animals given to man at the Creation (Genesis I, 26) implies the correlative duty and obligation of treating them humanely, acting as their protectors and saving them from ill-usage. This implicit principle finds expression in numerous definite precepts – positive commandments and prohibitions.

The weekly Sabbath day must be a day of rest not only for human beings, but also for cattle. 'The seventh day shall be a Sabbath to the Lord thy God; in it thou shalt not do any manner of work, thou, nor thy son, nor thy daughter, nor thy man-servant, nor thy maid-servant, nor thy cattle,' are the words in the Fourth Commandment of the Decalogue given on Sinai (Exodus XX, 10). In the second version, in the Book of Deuteronomy, this is put in fuller detail: 'Thou, nor thine ox, nor thine ass, nor any of thy cattle' (Deuteronomy V, 14). One of the purposes of the Sabbath is 'that thine ox and thine ass may have rest' (Exodus XXII, 12).

In the Sabbatical year the produce of the land that grew of itself was to be free to all the beasts of the field, including wild animals. The ox threshing out the corn was not to be muzzled (Deuteronomy XXV, 4). Just as the human labourer was free to eat of the produce of field, vineyard, olive yard or orchard in which he was working (Deuteronomy XXIV, 25–26), so was the dumb brute freely to eat of the grain that he was threshing. An animal was not to be taxed beyond its strength. 'Thou shalt not plough with an ox and an ass together' (Deuteronomy XXII, 10). The strength of the ass being less than that of the ox, there would be an unfair demand upon the former when they were drawing the ploughshares together (Tbn Ezra's Commentary *ad locum*).

The mother of an animal and its offspring must not be slaughtered on the same day (Leviticus, XXII, 28). The young of an animal must not be taken from its dam, ————— for the first seven days after birth (Leviticus, XXII, 27). An animal that has fallen down must be helped to rise up (Deuteronomy XXII, 4). Even if the beast belongs to an enemy, we may not pass by and leave it prostrate. 'If thou see the ass of him that hateth thee lying under its burden, thou shalt forbear to pass it by; thou shalt surely release it with him' (Exodus XXII, 5). The principle of kindness to animals is summed up in the text which is the Scriptural origin of the saying, 'A merciful man is merciful to his beast,' namely, in the verse, 'The righteous man regardeth the life of his beast,' or literally, 'The righteous man knoweth the soul of his beast' (Proverbs XII, 10).

The Talmudic Law emphasizes and develops the principle of kindness to animals. It declares that cruelty to animals is forbidden by God (Baba Mezia 32b, 331; Maimonides Code, Hilchos Rotzeach

XIII, 8). It forbids mutilation or gelding (castration) of animals (Even Haezer v.11; Sifra to Leviticus XXII, 24; Sabbath 111a). Rabbinical Judaism prohibits hunting for sport (Chulin 60a; Avoda Zara, 18b; Responsa of Meir Rotenberg, Response 27; Maimonides Code, Hilchos Melachim 6; Noda Biyehudah of Ezekiel Landau II Yoreh Deah Response 10).

Before a Jew sits down to a meal he must first feed his domestic animals, in accordance with the sequence of sentences in the text: 'And I will give grass in thy fields for thy cattle, and thou shalt eat and be satisfied' (Deuteronomy XI, 15; Berachos 40a; Gittin 62a). The Jewish homilists say that Moses and David were chosen leaders of Israel, 'taken from the fold to feed God's people, because as shepherds they showed themselves kind and faithful to the lower animals entrusted to their care (Midrash Rabbah on Exodus II, 3). There must be no wanton injury to any living creature, 'for God is good to all, and his tender mercies are upon all his works' (Psalms CXLV, 9).

We so submit,


Neville Kesselman

Campaign for the Protection of Shechita
London;

Government Buildings, Hook Rise South
Tolworth, Surbiton, Surrey KT6 7NF
Direct Line: 0181 330 8032 (GTN 3836)
Switchboard: 0181 330 4411 Fax: 0181 335 4274



Rabbi Neville Kesselman
President
Campaign for the Protection of Shechita
3 Vincent Court
Bell Lane
London
NW4 2AN

3 June 1999

Dear Rabbi Kesselman

Thank you for your reply to our *Welfare of Farm Animals at Slaughter* consultation letter. Your comments and views have been duly noted and will shortly be brought to the attention of working group members.

Yours sincerely

A handwritten signature in black ink, appearing to be "Marc Muir". The signature is fluid and cursive, with a long horizontal stroke at the end.

Marc Muir
FAWC Secretariat

CAMPAIGN FOR THE PROTECTION OF SHECHITA

3 Vincent Court, Bell Lane, London NW4 2AN

Tel: 0208 203 4711

Email: chano@blueyonder.co.uk

TDS

Dr Judy MacArthur Clark
Chairwoman
Farm Animal Welfare Council
1A Page Street
London SW1P 4PQ

24 June 2003

Dear Judy

Report on the Welfare of Farmed Animals at Slaughter or Killing Part 1: Red Meat Animals (June 2003)

We were pleased to meet you and your colleagues at FAWC's open meeting on June 18. You requested a copy of the Survey Report by Prof. Dr. W Schulze of the Veterinary School Hanover which appeared in the German Veterinary Weekly Journal, 5 February 1978. He reaffirmed his findings and conclusions in a supplemental report dated 10 September 1985. I enclose a translation from the original German.

In a number of paragraphs of FAWC's report reference is made to;

- "The Council... considered scientific evidence..." Para 14
- "Written evidence was taken... from experts in the field" Para 14
- "The scientific evidence shows... become insensible..." Para 198
- "A separate study of brain response after shechita..." Para 198
- "Recent research... on the efficiency of bleed-out in sheep..." Para 202
- "The scientific evidence supports..." Para 205
- "There has been significant research... to define the signs of unconsciousness in animals..." Para 216.

FAWC's report has no bibliography or "sources". We would be obliged if you could send us copies of the above scientific and research documents referred to, published or unpublished. When can we expect your forthcoming "Poultry Report"?

Thank you for your kind assistance.

With best wishes

Yours sincerely
Neville

President: Rabbi Neville Kesselman MA Barrister-at-law

Vice President: Chano Kesselman

Rabbinical Advisor: Rabbi Benjamin Vorst

Political Director: Professor Geoffrey Alderman MA DPhil (Oxon) FRHistS FRSA MIQA



FAWC, 1A Page Street, London SW1P 4PQ
Tel: 020 7904 6531 Fax: 020 7904 6993 email: Kumu.D.Adhithetty@defra.gsi.gov.uk

Rabbi Neville Kesselman
President, Campaign for the Protection of Shechita
3 Vincent Court
Bell Lane
London
NW4 2AN

3 September 2003

Thank you for your letter of 24 June. I'm sorry for the delay in responding to you but I have been out of the country for much of the last two months.

I am grateful for the translation of the report by Professor Dr W Schulze. As you have probably noted, FAWC Reports conventionally do not include a list of scientific references. Whilst the relevant scientific literature is always considered when deliberating advice to Ministers, FAWC's role is to embrace scientific evidence whilst taking on board observations made during visits together with applying the practical and technical expertise and experience of its members.

It is of course for Ministers to decide how they choose to respond to FAWC advice and we await the Government's response to the range of recommendations contained in the Welfare of Farmed Animals at Slaughter or Killing (Red Meat Animals) Report. It therefore seems unproductive to re-open a dialogue on the science at this stage.

You will be interested to know that the Slaughter Working Group has reconvened to review white meat slaughter and a consultation letter will be circulated shortly in this context.

Yours sincerely

A handwritten signature in black ink, which appears to read 'Judy MacArthur Clark', is written over a horizontal line.

Judy MacArthur Clark



FAWC, 1A Page Street, London SW1P 4PQ
Tel: 020 7904 6532 Fax: 020 7904 6993 email: Richard.N.Aram@defra.gsi.gov.uk

Our ref: AWC 480

To organisations listed
in the Appendix

11 November 2003

Rec. 18/11/03

Dear Sir/Madam

THE WELFARE OF WHITE MEAT ANIMALS AT SLAUGHTER

1. Following the publication of the FAWC report on the welfare of red meat animals at slaughter or killing in June this year, the Council is now continuing with its review of the welfare of farmed white meat animals at the time of slaughter.
2. We are grateful for the comments we received on white meat slaughter when the initial consultation, which covered both red meat and white meat animals was conducted in 1999. We will be taking these comments on board in the course of our review. However, given the time that has elapsed since that consultation and the developments that have taken place, we felt that it would be appropriate to consult you again in order to obtain your current views on the subject.
3. The white meat review will concentrate on the welfare of livestock at the place of slaughter which will predominantly be at the processing plant. It will also cover on farm slaughter, including casualty and emergency slaughter as well as mass killing on farm for disease control. The species covered will be farmed white meat animals including broilers, end of lay hens, turkeys, ducks, geese, guinea fowl, quail, farmed game and rabbits. The design of transport systems, as they relate to welfare of birds at lairage will also be included in the study.
4. We would be grateful for your organisation's views on the animal welfare aspects of the white meat slaughter process. Please feel free to comment on the strengths and weaknesses of current practices. We would particularly welcome information on any

aspect of current or proposed research and development relating to slaughter of these animals.

5. In addition to this consultation exercise, we may write to some organisations with specific questions as work progresses. Some may also be invited to discussions with the Group. Normally FAWC reports list the names of the organisations that gave evidence. Should you prefer to be excluded from the list, please let us know when you reply.

6. If you believe there are any important omissions from the list of consultees, I should be obliged if you would let me have the name and address of an appropriate contact.

7. FAWC thanks you for your co-operation and looks forward to receiving your comments by 31 January 2004.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Kumu Adhihetty', written in a cursive style.

Kumu Adhihetty
FAWC Secretariat

CAMPAIGN FOR THE PROTECTION OF SHECHITA

3 Vincent Court, Bell Lane, London NW4 2AN

020 8203 4711

email: chanq@bluevonder.co.uk

FAWC Secretariat
1A Page Street
London SW1P 4PQ

Your Ref: AWC 480

27 January 2004

Dear Sir/Madam

THE WELFARE OF WHITE MEAT ANIMALS AT SLAUGHTER.

We acknowledge your letter dated 11 November 2003. You received our comments dated 24 May 1999 on your initial invitation dated 31 March for consultation on welfare at slaughter. We reiterate our comments including our reference to the bias and misrepresentation manifested in your 1985 Report and Recommendations on the Welfare of Livestock when Slaughtered by Religious Methods (FAWC ref book 262).

In your Red Meat Animals Report June 2003 you assert that "Religious issues surrounding slaughter without pre-stunning were explored in detail in the FAWC report on religious slaughter published in 1985 and have not been reiterated in this report." Contrary to this assertion, those issues have been reiterated in the June Report and you recommend re-examination of "outstanding welfare issues". Your comments about your remit therefore are misleading and less than frank. The bias and misrepresentation contained in FAWC 262 are continued in the red meat Report June 2003.

In regard to FAWC 262 (1985) we reiterate our comments on that report which we submitted to government (MAFF) on 29 October 1985. Your treatment of shechita, the Jewish religious-humane method, has been distorted and unfair in both your reports (FAWC 262, 1985 and June 2003).

In due course our representations to DEFRA will include a recommendation that FAWC's remit shall not include religious slaughter. The Council has demonstrated grave lack of objectivity in failing to treat Jewish and Muslim methods separately. Notwithstanding the significant differences between the two methods, FAWC has unfairly and unscientifically attributed to shechita, the shortcomings you have found in Halal slaughter resulting in misleading conclusions and seriously misrepresenting shechita.

In the mid 1980's your review of welfare at slaughter treated red meat animals as a general issue and resulted in your Report in 1984 (FAWC ref 248) and excluded religious slaughter methods. These methods were separately and significantly the subject of a later review and resulted in your Report on religious slaughter in 1985 (FAWC ref 262). It is therefore a matter of concern that you failed to refer to religious slaughter methods in your invitations on 31 March 1999 and 11 November 2003 for consultation and comment. May we conclude from your omission to any reference to religious slaughter in those invitations, that it will not be part of your review and report on white meat animals? If you intend to review religious slaughter why was this fact not mentioned in those invitations?

Yours faithfully,



Neville Kesselman