

# Supply of Qurbani Meat and Offal during Eid al-Adha in England and Wales: summary of stakeholder responses

Consultation responses on whether changes should be introduced to the chilling requirements of Qurbani meat and offal supplied from slaughterhouses in England and Wales during the period of Eid al-Adha.

PDF

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## Introduction

This [12 week consultation](#) was issued on 20 June 2022 and closed on 11 September 2022.

The consultation sought views from stakeholders on whether changes should be introduced to the chilling requirements of Qurbani meat([footnote](#)) and offal supplied from slaughterhouses in England and Wales during the period of Eid al-Adha.

Engagement with the Qurbani Partnership Working Group Sub-Group (QPWG SG) has been ongoing since 2019. Background information on the QPWG SG's membership and work can be found in the [consultation pack](#). The group is supportive of the consultation to obtain the views of wider stakeholders.

The FSA is grateful to those stakeholders who responded and sets out in the tables below responses in order of the issues considered. A list of those who responded (excluding private citizens) can be found at the end of this document.

The consultation sought views on the following two options for a long-term approach for the future supply of Qurbani meat and offal from slaughterhouses in England and Wales:

**Option A** - Full enforcement of the current legislation for example, phasing out the current flexible approach to enforcement with full adherence to the chilling requirements for all meat and offal prior to leaving the slaughterhouse.

**Option B** – Introduce a legislative change to allow a derogation from the chilling requirements for Qurbani meat and offal from slaughterhouses in England and Wales.

The FSA also invited feedback on:

- how the proposals would impact on consumers and food businesses operators (positive and negative).
- whether stakeholders had any additional matters of interest within the scope which were not mentioned in the consultation pack.
- how the direct supply of Qurbani meat and offal during Eid al-Adha would impact on Food Law Enforcement Officers (FLEO) of competent authorities (positive and negative).

The consultation was published on the FSA website and communicated via social media channels. Emails were sent to interested parties including businesses with an interest in supply of

red meat during the Eid al-Adha festival, and Local Authorities who were notified of the consultation launch.

## Summary of responses

A total of 61 responses were received. The FSA's responses to stakeholders' comments are provided in the last column of the table within the "Responses to Comments" section.

**Please note that all comments provided are in the main presented as submitted by the respondent. However typographical errors have been amended where appropriate to aid readability of the document.**

Note: All comments received are respondents own views and do not reflect the views of the Food Standards Agency. Some comments have only been reproduced in part so as not to cause offence, Additionally, some responses were deemed to be outside the scope of the consultation.

A list of stakeholders who responded can be found at the end of this document.

Note: The figures in brackets below show the number of responses received in each category as % of the total overall number (61) of responses received. All % figures have been rounded to the nearest whole number.

### Preferred choice of option from the first question of the consultation

Option	Number of responses
<b>Option A:</b> Full enforcement of the current legislation i.e. phasing out the current flexible approach to enforcement with full adherence to the chilling requirements for all meat and offal prior to leaving the slaughterhouse.	21 (34%)
<b>Option B:</b> Introduce a legislative change to allow a derogation from the chilling requirements for Qurbani meat and offal from slaughterhouses in England and Wales.	40 (66%)
Total	61 (100%)

## Characteristics of respondents

Responses received from	Number of Responses
Consumers	44 (72%)
Food Business Operators (FBOs)	3 (5%)
Food Law Enforcement Officers	6 (10%)
Other	8 (13%)
Total	61 (100%)

## Breakdown by Respondent Category

Responses received from	Number of responses option A	Number of responses option B
Consumer	12 (20%)	32 (52%)
Food Business Operator	1 (1%)	2 (3%)
Food Law Enforcement Officer	4 (7%)	2 (3%)
Other	4 (7%)	4 (7%)
<b>Total</b>	<b>21 (34%)</b>	<b>40 (66%)</b>

73% of consumers who provided a response were primarily in favour of Option B (introduce a legislative change to allow a derogation from the chilling requirements for Qurbani meat and offal from slaughterhouses in England and Wales). In the main, they stated religion / cultural beliefs and freedom of choice as the main reasons for their response. Comments provided by consumers in favour of Option A (full enforcement of the current legislation) related to consumer concerns for food safety risks and the lack of available science based evidence to support a change in legislation.

66% of responses from Food Business Operators (FBOs) expressed a preference for Option B to enable them to dispatch meat partially chilled to meet the demand of consumers collecting Qurbani meat and offal on the first day of Eid al-Adha.

Two thirds (66%) of Food Law Enforcement Officers (FLEO) responding preferred Option A because they felt Option B would create double standards and would be difficult to enforce.

Responses from “other” sources such as industry bodies and campaigners was evenly split between Option A and Option B.

These responses will help inform the FSA’s next steps and will inform the decision on the future direction of the proposal.

A small number of responses were in relation to issues which are outside of the scope of the consultation.

## **Responses to Comments**

### **Reasons given for selection option A, full enforcement of the current legislation.**

**For example, phasing out the current flexible approach to enforcement with full adherence to the chilling requirements for all meat and offal prior to leaving the slaughterhouse.**

#### **1. Comment**

Consumer chilling should be adhered to and not stopped for logistics reasons as it's not a religious requirement.

#### **FSA Response**

Comment noted.

#### **2. Comment**

Consumer - If there is no or minimal risk with the derogation requirements, then why have the full chilling requirements at all? My view is that these regs are necessary for food safety and to make allowances will increase the risk for food poisoning, especially since the distribution conditions after leaving the slaughterhouse are far less stringent and uncontrolled. It just does not make sense to relax the regulations, particularly since it is not for religious reasons but only for custom and practice. There is no logical reason to even consider deviation from the existing regulations.

#### **FSA Response**

Comment noted.

### **3. Comment**

Food Law Enforcement Officer (FLEO) - It is pointless to temporarily relax the legislation and a few days later revert to business as usual. The bacteria will not be on holiday during that period.

#### **FSA Response**

Comment noted.

### **4. Comment**

FLEO - It becomes a massive point of contention when you begin enforcement proceedings against an FBO for not adhering to chilling requirements. The stock answer from FBOs is how can this be important this week when it wasn't important for 4 days in the middle of summer etc. this makes the job in plant a lot more difficult.

#### **FSA Response**

Comment noted.

### **5. Comment**

FLEO - As an enforcement officer I feel it is completely unfair to treat FBOs differently based on religious beliefs. From the public health point of view, it makes no sense whatsoever permit relaxed chilling requirements for plants slaughtering animals during Qurbani, but then enforcing the legislation fully outside of it. It creates double standards and penalise / discriminate other FBOs indirectly and unnecessarily.

#### **FSA Response**

Comment noted.

### **6. Comment**

Food Business Operator (FBO) - The original legislation was introduced to protect the consumer from potential bacterial contamination and to reduce the overall risk of food related poisonings. To make exceptions to this working practice, for whatever reason, make a mockery of our rules-based system and could potentially open the floodgates for similar exceptions. Talking from a personal perspective, I have had goods rejected from my retail and manufacturing customers for being over 5 degrees on arrival despite the ambient temperature being in the high 30's resulting in huge personal cost. To make it legal to sell meat straight from the slaughter line makes a complete farce of our existing rules. I totally object on every level.  
FSA Comment – typographical adjustments made.

#### **FSA Response**

Comment noted.

### **7. Comment**

FLEO - Anything less is allowing bad practice, contrary to hygiene regulations and legislation.

#### **FSA Response**

Comment noted.

## **8. Comment**

Consumer - The current regulations regarding the chilling of meat and offal are based on proven scientific facts regarding the safe preservation of meat, offal and other animal products. Ensuring a longer period of safe edibility helps to reduce food waste.

### **FSA Response**

Comment noted.

## **9. Comment**

Consumer - All meat and offal should be kept appropriately chilled at all time with no exceptions for any reason.

FSA Comment - typographical adjustments made.

### **FSA Response**

Comment noted.

## **10. Comment**

Consumer - There should be no live ritual slaughter of animals - this cruel and pointless practice must be prohibited

### **FSA Response**

The method of slaughter is outside the scope of this consultation.

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England, [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **11. Comment**

Other - We have observed many malpractices in slaughterhouses and secondly the meat hygiene is an important of teaching of Islam. If there is any risk of meat hygiene which does - its an ultimately human life so not take risk and to practice full enforcement to fulfil chilling requirements.

FSA Comment - typographical adjustments made.

### **FSA Response**

Comment noted. This consultation does not intend to affect the delivery of official controls in slaughterhouses.

## **12. Comment**

Consumer - Ban all Halal meat in the UK [...] ban it now.

FSA note: Comments received adjusted for reasons stipulated on page 2.

## **FSA Response**

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England, [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### **13. Comment**

Consumer - Given some level of food safety risk remains government should not disregard safe food practices in law.

## **FSA Response**

Comment noted.

### **14. Comment**

Other - This country should not permit ritual slaughter at all. Cast off meat is being sold unlabelled to non Muslim/Jewish people, who do not want to eat meat produced via these [ ] measures, so all legislation pertaining to this subject should be adhered to until this totally unnecessary practice is banned

FSA Note: Comments received adjusted for reasons stipulated on page 2.

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England, [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **FSA Response**

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England, [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### **15. Comment**

Consumer - Meat that is not humanely stunned before slaughter should be clearly labelled for the public to be fully informed and able to make an informed choice.[....]

FSA Note: Comments received reproduced in part for reasons stipulated on page 2.

## **FSA Response**

Comments noted.

[Defra](#) are the responsible authority for Food labelling in England. Food labelling is also a devolved policy area and straddles the remit of multiple departments and agencies. FSA has policy responsibility for food safety and protecting consumer interests, which requires accurate food information. In Wales, the FSA has responsibility for compositional standards and labelling

Welsh Government is responsible for labelling as it relates to specific policies including animal welfare.

However the method of slaughter is outside the scope of this Consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales.

The FSA will share feedback on these subjects with Defra and Welsh Government as appropriate.

## 16. Comment

Consumer - There are no good reasons for any supply of [ ] meat. It must be stunned before slitting its throat.

FSA Note: Comments received adjusted for reasons stipulated on page 2.

## FSA Response

The method of slaughter is outside the scope of this consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on these subjects with Defra and Welsh Government as appropriate.

## 17. Comment

Other –

- there are insufficient safeguards and mitigations in the proposals to support such a marked departure from the existing framework of controls and the underlying principles of food safety.
- FSA surveys established risk levels as “low but cannot be excluded” and “significant uncertainties still remained” and would therefore be opposed to the Food Standards Agency’s long adherence to the precautionary principle.
- for example, the current derogation allowed for “warm meat” transport is justified scientifically and is very tightly controlled requiring prior OV approval, prior notification of the destination of all consignments, strict traceability and temperature controls which guarantee continuous chilling.
- it is difficult to see how any of the above requirements, particularly the principle of continuous chilling, could apply easily in the Qurbani meat situation despite the mitigations.
- there is no guarantee that any derogated Qurbani meat could not be diverted into export.
- long-promised improvements to traceability systems are not yet in place and still seem some way off.
- we completely respect and understand the strong desire of the Muslim consumers to take delivery of Qurbani meat as soon as possible but do not feel that this should override food safety considerations especially as it is not considered a strict religious obligation by senior Iman’s.
- there is still plenty of time to allow fully chilled Qurbani meat to be consumed well within the four-day festival period.
- we respect and acknowledge the cooperative hard work of the sub-group including other meat industry sectors, but we feel that any new legislation should be more far-reaching and include derogations for other diverse situations.

## **FSA Response**

Comments noted.

### **18. Comment**

Other - Whilst it is important to respect everyone's religious beliefs, festivals and celebrations, I don't know of any recognised religion, including the Muslim faith that would put the safety of their believers or others at any risk from illness.

FSA comment - typographical adjustments made.

## **FSA Response**

Comments noted.

### **19. Other**

As you stated in the consultation document on page 5 "Advice was sought from the Chief Imam at the London Central Mosque who confirmed that quick supply of the Qurbani meat is observed practice and not a religious obligation". Therefore, whilst it may be slightly inconvenient to wait until the 2nd day of this celebration to consume or distribute the meat, in order to allow the meat to be chilled to a core temperature of 7°C (carcase) or 3°C (offal) at red meat slaughterhouses, it helps remove a potential risk to the consumer.

The few people I have spoken to, whom identify with the Islamic faith, agree that the safety of the consumer is more important than having the meat on the first day of this religious festival. They also agree with the view stated by the Chief Iman at the London Central Mosque.

## **FSA Response**

Comments noted.

### **20. Comment**

Other - The Food Standards Agency's (FSA) full report into the "Assessment of the risk to consumers as a result of disruption to the cold chain during direct supply of Qurbani meat and offal" which forms part of this consultation documentation, whilst an attempt to outline the safety issues etc shows some concerning views particularly in relation to uncertainty.

It states under Lay Summary "We concluded that in a typical scenario the risk to consumers is Very Low ("very rare, but cannot be excluded"). However, in a worst-case scenario there is an increased Low level of risk ("rare but does occur"). We also identified several areas where more evidence would be helpful, and as a result identified a High level of uncertainty"

Given the levels of uncertainty it must be extremely difficult to come up with very low or low risk levels considering that the majority of foodborne illness cases are not reported, as previous studies and reports have indicated this.

These uncertainties and questions for Food Business Operators & Official veterinaries were:

- the average core/surface temperature achieved for ovine offal
- the average core/surface temperature achieved for bovine offal
- the average core/surface temperature achieved for caprine offal
- the average core/surface temperature achieved for sheep/lambs



- the average core/surface temperature achieved for cattle
- the average core/surface temperature achieved for goats
- reasons for Urgent Improvement Necessary (UIN) and Improvement Necessary (IN) status in slaughterhouses.
- time between slaughter and collection

**These uncertainties and questions in relation to consumers were:**

- the temperature of carcase/offal when it arrives at consumer home, and the length of the journey there (if not transported under refrigerated conditions).
- how many carcasses/offal are being collected by individual consumers?
- length of time carcase/offal remains at room temperature upon arrival at consumer home
- what does portioning meat at home entail? Do some consumers butcher whole/half carcasses in the home?

**Other uncertainties:**

- recent prevalence and enumeration of Salmonella spp., C. perfringens and STEC in beef, lamb and goat meat and red offal within the UK, post slaughter.
- the difference in contamination levels between meat and offal, between animals from different farm types and between products from premises with no audit actions, IN and UIN.
- whether or not contaminating strains of Salmonella, C. perfringens and STEC would behave similarly to strains used in lab-based studies of growth on meat and when compared to ComBase modelling.
- epidemiological data linking cases of illness to the consumption of Qurbani meat/offal
- do butchers further chill meat before it reaches final consumers? (and if so details of the process)

In relation to the uncertainties reasons for Urgent Improvement Necessary (UIN) and Improvement Necessary (IN) status in slaughterhouses, this is quite surprising as the FSA are responsible for the running of the Meat Hygiene Service which also includes their service delivery partners.

One would have thought that after all these years of running the Meat Hygiene Service, this information should have been recorded and kept at the time of every slaughterhouse audit, as it is valuable data that could have been used to help improve all round compliance given the following:

On the 20th February 2017 the Bureau of Investigative Journalism in conjunction with the Observer newspaper released the following article (link below), that one in four UK slaughterhouses were failing to meet basic hygiene standards. Read the full article [One in four UK slaughterhouses fails to meet basic hygiene standards](#) (The Bureau Investigates).

On 23rd February 2018, an article in the Guardian newspaper, carried out in conjunction with the Bureau of Investigative Journalism revealed, that “almost two thirds of audited meat plants were in breach of safety rules in England, Wales and Northern Ireland”. (Scotland has its own FSA).

The article also stated that, “on average, 16 major failings were recorded every week over the past three years”. This information was gained from research into FSA audits. 540 out of 890 meat cutting factories had at least one instance of major non-compliance with food hygiene safety regulations. The FSA’s definition of a major non-compliance is “likely to compromise public health, including food safety”.

The link to the full article is below: [Fear of UK Meat scandal as data shows hygiene breaches at most plants \(The Guardian\)](#).

This is also highlighted by the FSA's meat plant audits, as their Performance & Resources Report in period Q4 2021/2022 showed that 59.3% were good and 37.4% were generally satisfactory, with 0.8% requiring improvement necessary and 0.5% requiring urgent improvement.

From a recent cursory view of the FSA audits of slaughterhouses the majority of the 37.4% that were generally satisfactory had one major non-compliance at the initial time of the audit. This means that legislative requirements were not being met at the start of the audit even if they were rectified during the audit.

Since 2017 it appears there has been no significant improvement in the FSA's own audit results of slaughterhouse. This is further indicated by the Food Standards Agency's (FSA) full report into the "Assessment of the risk to consumers which forms as a result of disruption to the cold chain during direct supply of Qurbani meat and offal" which forms part of this consultation documentation, where it states "From the OV responses provided in 2021, 9 slaughterhouses (28%) providing Qurbani meat had UIN or IN status and 23 (72%) did not".

I believe that the problem of poor audit results appears to be a problem across a range of different Food Business Operators (FBO's) who operate slaughterhouses.

FSA Comment – typographical adjustments made.

## **FSA Response**

The purpose of the consultation was to seek views from stakeholders on whether changes should be introduced to the chilling requirements however your points on the levels of evidence available which contribute towards the [FSA's risk assessment](#) will be noted.

The categorisation of Improvement Necessary (UIN) / Improvement Necessary (IN) covers the non-compliances found under various retained EU Regulations in relation to food safety and hygiene. Please note that the FSA has replaced the Meat Hygiene Service as the competent authority.

The audit results mentioned do not differentiate between Halal and non-Halal premises. The audit reports will reflect non-compliance identified during the audit period but these may have been closed at the time of the audit to show the FBO had undertaken corrective action. The highest risk abattoirs were excluded from supplying un-chilled Qurbani meat direct to the final consumer during Eid al-Adha.

Uncertainty relating to the reasons for Urgent UIN / IN status in the FSA's risk assessment are for those FBOs supplying Qurbani meat and that are reported to fall into UIN or IN status by OVs at the time of the 2021 questionnaire.

Data from the 2021 questionnaires used for the FSA's risk assessment suggests that 28% of the slaughterhouses supplying Qurbani meat fell into UIN or IN status.

This has been taken into consideration in the worst-case scenario – Step 2: Slaughterhouse. Some slaughterhouses (28%) had UIN or IN status at audit, indicating major and/or critical non-compliances in areas which may represent a risk to public health. Evidence allowing this risk to be quantified was unavailable.

Although the scope of the FSA's risk assessment is focused on meat provided during the Qurbani period and not for meat placed on the open market, when the risk assessment was conducted the FSA sought guidance from the Field Vet Lead to better understand how representative this was for all slaughterhouses. They reported the proportion of slaughterhouses that fell into the UIN or IN categories across the UK in 2019 – 2021 was around 3% (Pers

## 21. Comment

Other - In relation to the industry led mitigations published on the Agriculture and Horticulture Development Board (AHDB) website at <https://ahdb.org.uk/halal> I would wish to make the following comments: EID07 AHDB Qurbani consumer leaflet and EID10 consumer information sheet for partially chilled offal should be considered as a good attempt to supply information to the consumer.

I am just not sure if in this busy time of slaughter etc. that this information always gets to the consumer with the other time constraints involved due to the higher volume of work at this period.

The FSA's full report into the "Assessment of the risk to consumers as a result of disruption to the cold chain during direct supply of Qurbani meat and offal also stated:

"It is important to note that the mitigation that slaughterhouses placed under UIN or IN status would not supply Qurbani was proposed by industry and was in place for Qurbani 2020. This mitigation was not in place for Qurbani 2021 therefore slaughterhouses assigned UIN or IN status following audit were able to supply Qurbani meat and offal. Whether or not this mitigation will be in place for future years is under discussion".

Why was this mitigation removed in 2021 and if the consultation result is in favour of Option B – Introduce a legislative change to allow a derogation from the chilling requirements for Qurbani meat and offal from slaughterhouses in England and Wales, will this mitigation introduced in 2020 be reinstated?

FSA Comment – typographical adjustments made.

## FSA response

Information regarding the mitigations was available to consumers on the AHDB website a few months prior to and during the festival of Eid al-Adha.

At the suggestion of industry representatives this mitigation on Urgent Improvement Necessary (UIN) or Improvement Necessary (IN) establishments was introduced in 2020 as part of the overall suite of mitigations. In 2021, the 2020 mitigations were enhanced and re-implemented but at the request of industry this specific mitigation was not re-implemented.

Current mitigations were proposed by industry and developed by QPWW SG members. Any future changes will follow the same development process.

## 22. Comment

Other- (Feedback was received via Email) The FSA's full report into the "Assessment of the risk to consumers as a result of disruption to the cold chain during direct supply of Qurbani meat and offal further stated: "The population under consideration is Muslim residents in the UK who purchase Qurbani from a UK slaughterhouse. This is estimated in Section 1.6.2. From the data available it is thought that between 25% - 50% of the total Muslim population, which is around 3.3 million people, perform Qurbani in the UK and the rest donate their Qurbani outside of the UK. Vulnerable groups (young children or >65) form 38% of the Muslim population, though this is likely to be an overestimate".

For the point of discussion only, if we said that approximately 25% of the Muslim population of 3.3 Million people performed Qurbani in the UK, this would equate to 825,000 people. If we assume 30% of these are considered to be vulnerable groups, such as the young, pregnant women, the

elderly or those immunocompromised, that would be 247,500 people, which is potentially a lot of people to expose to additional risks from foodborne illnesses. Salmonella enterica spp, Yersinia enterocolitica, Listeria monocytogenes, Clostridium perfringens and Shiga toxin-producing Escherichia Coli (STEC) are mentioned as microorganisms of concern in the assessment of risk to consumers that forms part of this consultation.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. A Consumer Information Leaflet (EID07) and a Consumer Information Leaflet on partially chilled offal (EID10) has also been published on the [AHDB Website](#) to raise awareness.

## **23. Comment**

Other - Cooking meat thoroughly is important in helping to kill bacterium, but there should be some concerns that some people may not be able to do this as well as previously, due to the high cost of energy at the present time. (The charity National Energy Action has estimated that price rises in 2021 and April 2022 will lead to an increase in the number of households in fuel poverty of more than 50 per cent. This estimate does not take account of any further increases in prices in October 2022).

## **FSA Response**

Comment noted.

## **24. Comment**

Other - Recently the Chartered Institute of Environmental Health (CEIH) has been receiving comments from their Environmental Health Officers/Practitioners that they are finding hygiene standards have dropped now that local authorities have resumed food inspections.

## **FSA Response**

Comments noted. The majority of establishments affected by this consultation will have official controls delivered by the FSA (these continued over the Covid period) and results of audit can be found at: [Auditing meat establishments, Food Standards Agency](#).

Local Authority Food Law Enforcement Officers were invited to respond to this public consultation. The leaflet 'Qurbani Butcher acting as consumer agent' (EID02) published on the [AHDB Website](#) provides details of the traceability requirements FBOs must adhere to during Eid al-Adha. This information must be retained for a minimum of one year and shall be made available to the competent authorities (i.e. local authority food law enforcement officers) on demand.

## **25. Comment**

Other - Whilst nobody is trying to prevent people from enjoying their festivals or celebrations, the FSA need to get a grip on the amount of foodborne illness in terms of health and the financial burden to the UK.

Published in March 2020 by the "The Burden of Foodborne Disease in the UK 2018" stated "Microbiological foodborne disease (FBD) places both a public health and financial burden on society. In 2018 there were estimated to be 2.4 million FBD-related cases in the UK". It also went

on to say “Based on 2018 case estimates, FBD costs society approximately £9.1bn a year.

It is important to keep bacterium out of the food chain and the environment as far as is possible. E.coli O157 and other forms of STEC have a very low infective dose (Less than a pin head) and if you go onto suffer from a condition called Haemolytic Uraemic Syndrome (HUS) caused by such bacterium, there is no specific treatment or cure to prevent long term kidney problems, brain damage etc or even death.

Non-O157 STEC’s reported cases should also be shown in these figures that the FSA use in relation to food, so that it gives a clearer picture as to the size of the problem now that PCR testing is more available in Laboratories. [Evidence in the conclusion section of the STEC's report: Shiga-toxin producing escherichia coli data 2019.](#)

In 2019, 1,720 confirmed cases of STEC were reported in England and Wales. These comprised of 539 laboratory-confirmed cases of STEC serogroup O157 (515 cases in England and 24 in Wales) and 768 cases (655 in England 113 in Wales) where a serogroup other than O157 was isolated (non-O157).

As you can see, the above confirmed number of STEC cases, overall has risen from the 2018 figure of 1,553 (that was shown in the FSA consumers risk assessment that forms part of the consultation documents) which is an increase of 187 confirmed cases.

Whilst the FSA’s Performance & Resources Report in period Q4 2021/2022 of 15 June 2022 (FSA 22/06/16) showed a fall in the number of reported E.coli O157 case and Salmonella cases, it shows an increase in the number of reported cases of Listeria monocytogenes, which are applicable to this consultation.

Also noted is the increase in the number of reported cases of Campylobacter which is not a microorganism of concern in the assessment of risk in relation to this consultation.

Recent figures from the Health Security Agency appear to indicate Listeria monocytogenes and E.coli O157 are on the increase and for week ending 4th September 2022 they have reported 38 E.coli O157 cases, which could indicate an outbreak.

The above increases appear to indicate, that the FSA’s policies are not working, yet the Agency is still progressing its Achieving Business Compliance Programme etc. which, I believe is, about using technologies such as computer-based information, rather than truly independent physical inspections.

It will also allow the British Retail Consortium (BRC) auditing, Red Tractor accreditation and the food industry carrying out its own inspections and thereby marking their own work.

Finally, in 2019, I believe, you should have consulted far wider to all possible interested stakeholders, than you did. This is because you are now saying in Option - B of this consultation “Introduce a legislative change to allow a derogation from the chilling requirements for Qurbani meat and offal from slaughterhouses in England and Wales”.

It is very difficult to talk seriously about legislative change when, I believe, you have ignored the enforcement of the legislation in the first instance and the failure to fully consult as mentioned above, in the first instance (three years ago) by what the FSA states below in this consultation document:

“currently take an interim, proportionate approach to the enforcement of the chilling requirements for Qurbani meat and offal which is supplied less than fully chilled”.

Your so called interim proportionate approach, is often known as “Light Touch Regulation”, which unfortunately in previous outbreaks of foodborne illnesses have, I believe, proved disastrous.

## **FSA Response**

Comments noted. The data referred to relates to all cases of STEC which includes, primary cases (which could be food related or picked up by contact with animals etc), secondary cases (likely infection between people), asymptomatic cases and travel related cases.

Although the total number of STEC confirmed cases in England and Wales in 2018 are mentioned, the focus of this [FSA's risk assessment](#) is on cases as a result of the incompletely chilled meats provided during the Qurbani period. The specific risk question considered was: Is there a significant (qualitative) difference in the microbiological health risk to the final consumer associated with the supply and consumption of bovine, ovine or caprine carcase meat and offal that has not been chilled to at least a surface temperature of 7°C (for meat) and a core temperature of 3°C for offal or below, prior to leaving the abattoir, compared to such carcase meat or offal that has been chilled to at least a surface temperature of 7°C (meat) and a core temperature of 3°C (offal) or below, prior to leaving the abattoir where mitigations are applied?

The FSA considered whether to include a variety of microorganisms in its risk assessment, and decided against including the pathogen *L. monocytogenes* as the evidence shows that a majority of listeriosis cases are caused by ready-to-eat food.

The FSA was not able to find evidence of STEC outbreaks as a result of current Qurbani practices in the UK. Two general outbreaks of STEC were reported in the UK between 2017-2019 associated with bovine meat and products thereof leading to 29 cases.

The FSA's Achieving Business Compliance Programme is out of scope of the consultation. Further information regarding the [Achieving Business Compliance Programme on the Food Standards Agency website](#) and [read further information on the purpose of the Operational Transformation Programme](#) (PDF).

The origin of the work was explained in the [Partnership Working Group section of the Public Consultation](#). This policy proposal is an opportunity for the FSA to identify areas where it can simplify or amend the law, to help deliver in line with the FSA's guiding principles of being risk based and proportionate.

The FSA have developed a risk based approach to this proposal since 2019. Initial evidence was gathered to assess the industry led proposals which informed the FSA's risk assessment. This consultation has sought to gather views on whether a long term legislative approach can be found and a decision on next steps relating to this policy will be based on the evidence provided from the risk assessment and the outcome of this consultation. This only impacts on those FBO's supplying Qurbani meat during the Eid al-Adha festival. We have encouraged all FBO's to make use of the full chilling requirements, we also have considered the cultural requirements of Muslim consumers.

In addition, FBO's are still required to adhere to food hygiene regulations, which if breached would be enforceable.

## **Reasons given for selecting Option B**

**Introduce a legislative change to allow a derogation from the chilling requirements for Qurbani meat for Qurbani meat and offal from slaughterhouses in England and Wales.**



## **1. Comment**

Consumer - It is a religious practice which is extremely important for it to go smoothly as possible and access to meat as quickly as possible.

### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

## **2. Comment**

Consumer - As this meat is consumed soon after slaughter or frozen there should be reasonable flexibility to allow customers to make choice for themselves.

### **FSA Response**

Comment noted.

## **3. Comment**

Consumer - the slaughter sharing and consumption of the meat is part of the occasion of the Eid celebration and it would be meaningless to impose refrigeration requirements.

### **FSA Response**

Comments noted. The purpose of refrigeration requirements is essential to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat.

The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

There is a strict regulatory framework that applies to the home slaughter of livestock in particular and the latter is detailed in the [FSA's Home Slaughter Guidance](#).

## **4. Comment**

Consumer - To be able to consume my Qurbani as soon as practical.

### **FSA Response**

Comment noted.

## **5. Comment**

Consumer - Will serve my purpose and needs and those of the community.

### **FSA Response**

Comment noted.

## 6. Comment

Consumer - Meat is quickly distributed to family, friends so risk applied to the normal circumstances doesn't apply in this scenario so warrants an adjustment to take in account this once a year event.

### FSA Response

Comment noted. The purpose of refrigeration requirements is essential to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat. Advice is available on the [EID07 Consumer Leaflet](#) and [EID10 Consumer Leaflet](#) on Offal on the [AHDB website](#).

## 7. Comment

Consumer - Allow the collection of Qurbani same day from the abattoir.

FSA Comment - typographical adjustments made.

### FSA Response

Comment noted. Full chilling would not restrict Qurbani meat from being collected from the abattoir on the same day. The purpose is to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat.

## 8. Comment

FBO - For our customers, it is very important that they receive the corresponding offal from their Qurbani carcasses.

The legislative requirement for offal to be fully chilled in accordance with the current legislation, prior to despatch makes this virtually impossible. With meat being able to be despatched partially chilled, but offal not, it creates difficulties for processors and distress for consumers wanting Qurbani.

### FSA Response

Comment noted.

## 9. Comment

Consumer - Religious significance and the ability to be able to carry out an act of worship which is an important and compulsory action for Eid.

## FSA Response

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

## 10. Comment

Consumer - There should be some flexibility for religious purpose.



## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **11. Comment**

Consumer - Due to religious obligations.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **12. Comment**

Consumer - Religious obligation.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **13. Comment**

Consumer - It is a very important period for Muslims in Eid.

## **FSA Response**

Comment noted.

### **14. Comment**

Consumer - As long as cleanliness and safety is adhered to, offal etc will be collected on the day and either cooked on the day or refrigerated by consumers so no additional health and safety issues will happen.

## **FSA Response**

Comment noted. The purpose of refrigeration requirements is essential to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat. Advice is available on the [EID07 Consumer Leaflet](#) and [EID10 Consumer Leaflet](#) on Offal on the [AHDB website](#). The advice of the Islamic Scholars on the supply of offal can be found in the [EID11](#) leaflet.

### **15. Comment**

Consumer - It's always good to give people options but I also believe all food hygiene should be evidence base; the chilling of the meat process should be explained.

## **FSA Response**

Comment noted. The [FSA's Risk Assessment](#) analyses the available evidence relating to the chilling of meat. The FSA recognises the scientific opinion issued by the [European Food Safety Authority](#) on the public health risks related to the maintenance of the cold chain during storage and transport of red meat (other than offal), in 2014. This led to the implementation of [Retained Regulation \(EU\) 2017/1981](#).

### **16. Comment**

Consumer - Normally, we would prepare the Qurbani meat soon as it reaches the house and any reminder is kept in the freezer. So there is no need for it to be delayed by chilling it prior to it leaving the slaughter house. In this way, it will also reduce the need for the extra energy required to chill the meat.

## **FSA Response**

Comment noted. The purpose of refrigeration requirements is essential to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat. Advice is available on the [EID07 Consumer Leaflet](#) and [EID10 Consumer Leaflet](#) on Offal on the [AHDB website](#).

### **17. Comment**

FLEO - I want my meat as per in line with religious practices. This is also traditionally how you have meat fresh all over the world and the UK.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **18. Comment**

Consumer - It will be great for us as Muslims to have availability of halal Qurbani meat for Eid al-Adha days. It will be great to have them fresh as possible.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **19. Comment**

FLEO - Just because it's a religion circumstances that happens once in a year. With proper monitoring and evaluation before and after slaughtering, risk involved have been minimized.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted.

## **20. Comment**

Consumer - The meat should be distributed immediately as per traditions the chilling is time wasting and resource wasting.

### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

The purpose of refrigeration requirements is essential to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat. Advice is available on the [EID07 Consumer Leaflet](#) and [EID10 Consumer Leaflet](#) on Offal on the [AHDB website](#).

## **21. Comment**

Consumer - It is better to consume the meat quickly as per the prophetic way.

### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

## **22. Comment**

Consumer - To deliver quickly, especially same day of Eid al-Adha. And we have experience of eating fresh cook meat, no problem happened whatsoever.

FSA Comment – typographical adjustments made.

### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not. The advice of the Islamic Scholars on this issue can be found on the [EID11 leaflet](#).

## **23. Comment**

FBO - Allow Qurbani meat to be picked up fresh from slaughter in refrigerated vehicles so that they can cool down en route.

FSA Comment – typographical adjustments made.

### **FSA Response**

Comment noted.

## **24. Comment**

Consumer – It is part of our religion that Qurbani meat and offal is taken and consumed / distributed as soon as possible after the animal has been slaughtered. The chilling process would add extra time, which is not needed.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

The purpose of refrigeration requirements is essential to limit food safety risks and whilst these proposals limit the level of chilling, the mitigations seek to ensure that consumers understand the consequences of receiving partially chilled meat. Advice is available on the [EID07 Consumer Leaflet](#) and [EID10 Consumer Leaflet](#) on Offal on the [AHDB website](#).

## **25. Comment**

Other - I'm missing a proper Eid al-Adha festival in Britain. I would like to physically go to a slaughterhouses with family members and watch while sacrificing my animal on the day of Eid al-Adha.

Eid al-Adha is about sacrifice and sharing meat with friends, family and poor people in our society. In Britain, we do not have any poor people who would be happy to accept Qurbani meat. So we have to find an alternative option to send Qurbani meat to poor countries around the world and distribute British Meat among poor communities.

Right now we go to a butcher shop to pay for Qurbani and don't get to see what animals I'm sacrificing. The butcher shop delivers all meat to us 1 or two days later. We also have problems with storing a whole animal in the fridge for that reason many households do not perform Qurbani in Britain.

The ideal solution I want In Britain is as follows;

I want to go to a farmhouse or slaughterhouse or an animal market with family members to buy an animal to sacrifice on the day of Eid al-Adha. I should be able to pay for an animal with my bank debit card and take a selfie with the animals that I purchased for Eid al-Adha and share it on social media!

After purchasing my animal should be kept in the slaughterhouse until the day of Eid al-Adha. On the day of Eid al-Adha, I go to the mosque to pray, after praying I drive to the slaughterhouse with family members to watch the sacrifice of my animal.

On the way home I want to take some Qurbani meat for me, friends and family members and the rest donated to a charity. I do not want to wait hours and hours in a slaughterhouse to take my Qurbani meat home. The Food Standards Agency (FSA) should make appropriate changes in the chilling requirements policy to enable us to take some Qurbani meat home as soon as possible.

The charity that would take my donated meat should be able to process Qurbani meat with food safety standards and distribute British Qurbani meat around the world to the poor communities who can not afford to pay for meat or sacrifice an animal themselves.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comments noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

The [FSA's Risk Assessment](#) analyses the available evidence relating to the chilling of meat.

There is a strict regulatory framework that applies to the keeping and slaughter of animals in general, and this information is available in the [FSA's Home Slaughter Guidance](#).

Animals arriving at a slaughterhouse must be slaughtered without undue delay. Animals should be kept away from direct contact with persons other than slaughterhouse staff to reduce distress. Please read [guidance on animal welfare for slaughterhouses](#) for further information.

Qurbani meat and offal that is supplied (as a charitable donation) from an approved establishment must be fully chilled in line with the current legislation prior to supply.

## **26. Comment**

Consumer - I need to collect carcass and will go to non Halal Monitoring Committee (accredited) butcher locally for further pieces and distribution.

FSA Comment – typographical adjustments made.

### **FSA Response**

Comment noted.

## **27. Comment**

Consumer - This is in line with our Islamic belief system.

FSA Comment - typographical adjustments made.

### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

## **28. Comment**

Consumer - It saves and it's quick.

### **FSA Response**

Comment noted.

## **29. Comment**

Consumer - Basic needs of a Muslims Christmas.

### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious

obligation.

### **30. Comment**

Consumer - It is part of our religion and festival to have Qurbani feasts immediately after slaughter. Hence, being able to collect the carcass is vital for us to be able to feast on the very same day.

#### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **31. Comment**

Consumer - Personally, I don't mind a short delay of 24hrs post the animal being slaughtered, though it would be advantageous to introduce quicker chilling processes.

#### **FSA Response**

Comment noted.

### **32. Comment**

Consumer - Religious Freedom and Consumer choice.

#### **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

### **33. Comment**

Consumer - I don't want this inhuman slaughtered meat in any of our abattoirs.

#### **FSA Response**

The method of slaughter is outside the scope of this consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### **34. Comment**

Other - The proposed approach will have little direct impact on our members who are primary producers of lamb and mutton, and are not responsible for processing, despatch and transport to the consumer. The festival dictates the exact date and time when livestock can be killed for Qurbani, therefore farmers will follow market signals when to market livestock for the festival.

The respondent (anonymised) is very aware that any food safety incident arising from the sale of under chilled meat and offal has the potential to damage the reputation of British product and this could negatively influence future demand. Therefore, public safety and confidence in the product is of the upmost importance to British producers. The industry wants to build demand for UK supplied Qurbani's as we believe animals produced and slaughtered in the UK offer consumers an outstanding product which meets the religious needs of Muslim consumers.

The respondent supports option B that allows for a derogation of the chilling requirements for supplying Qurbani meat and offal from slaughterhouses in England and Wales as we believe this provides the best option to grow demand for UK produced Qurbani animals.

## **FSA Response**

Comment noted.

### **35. Comment**

Other - The respondent (anonymised) welcomes this consultation on proposed changes to the chilling requirements of Qurbani meat and offal supplied from slaughterhouses in England and Wales during the period of Eid al-Adha. The successful development and adaption of consumer protection mitigation measures through joint working between industry and the FSA have allowed those members of the Muslim community who wish to so to collect their meat and offal as soon as possible after its slaughter as an important part of the festival celebrations.

In the light of the FSA commissioned risk assessment results, which identified a very low level of risk in a typical scenario (and a low level of risk in a worst-case scenario), the respondent (anonymised) would support the proposed approach outlined in OPTION B – legislating to allow a derogation in the chilling requirements for Qurbani meat and offal from slaughterhouses in England and Wales.

Having permitted such a derogation for many years since the chilling requirements were first introduced, albeit with more explicit mitigation measures over the past 3 years, enforcement of the current legislation (OPTION A) would be opposed by the several respondents (anonymised) members who meet the requests of consumers to provide unchilled meat during Eid al-Adha either directly or via butchers. In the absence of any significant risk to public health some Muslim consumers and representative organisations may perceive this as discriminatory and an attempt to restrict their practice of their religious beliefs.

Halal lamb consumption represents 20% of total lamb consumed in England, and Qurbani lamb represents a significant proportion of this consumption, with approximately 25% more lambs slaughtered in the month in which Qurbani falls than other comparable months. Any enforcement approach, which might jeopardize this market could have a severely detrimental impact on respondent members who provide Qurbani meat to Muslim consumers and have knock on consequences for the whole UK sheep industry at a time when they are already struggling to survive the significant increase in production input costs.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation. The advice of the Islamic Scholars on this issue can be found on the [EID11 leaflet](#).

Page 6 of the [FSA's risk assessment](#) which states: "Significant uncertainties remain, including the temperature of the carcase and offal when it reaches consumers, epidemiological data linking cases of illness to the consumption of Qurbani meat and offal, and the prevalence and

enumeration levels of the three pathogens in meat, especially goat, and offal. The overall uncertainty level for this assessment is High."

This policy proposal is an opportunity for FSA to identify areas where the law can be simplified or amended, helping to deliver in line with the FSA's guiding principles of being risk based and proportionate. The flexibilities (mitigations) implemented over the past three years were proposed and developed by industry representatives as part of the Qurbani Partnership Working Group (QPWG SG) for implementation during Eid al-Adha to meet the demands of the Muslim community whilst also providing consumer protection. When developing the mitigations, the QPWG SG considered and balanced the food safety risks around temperature control with potential risks to the final consumer.

The scope of this consultation relates to the safe (direct) supply of meat and offal during the Eid al-Adha period and any animals slaughtered and supplied outside of this (four) day period are not considered to be Qurbani meat.

**Comments provided for this question - Please provide any details/suggestions on additional mitigations or flexibilities that you feel should be considered relating to Option B.**

**1. Comment**

Consumer - Opportunity to carry out the Qurbani privately with private butcher. Being able to watch it the Qurbani.

**FSA Response**

This is outside the scope of this consultation. There is a strict regulatory framework that applies to the keeping and slaughter of animals in general, and to the home slaughter of livestock in particular and the latter is detailed in the [FSA's Home Slaughter Guidance](#).

**2. Comment**

Consumer - If there are any substantiated health consequences of not refrigerating that have been suffered by people then there could be clear guidelines for people to follow to avoid the health risks. People can be relied on to follow practical guidelines as the impact of not following them would be on their health.

**FSA Response**

Comment noted. Advice is currently available on the [EID07](#) Consumer Leaflet and [EID10](#) Consumer Leaflet on Offal on the [AHDB](#) website.

**3. Comment**

Consumer - Consumer meat handling information.

**FSA Response**

Comment noted. Advice is currently available on the [EID07](#) Consumer Leaflet and [EID10](#) Consumer Leaflet on Offal on the [AHDB](#) website.

**4. Comment**



Consumer - Mitigation is that it's a small quantity distributed as an act of charity within a few hours of arrival making it easy to store, or cook on receipt. It's red meat, goat, lamb and sheep.

## **FSA Response**

Comment noted. Qurbani meat and offal that is supplied (as a charitable donation) from an approved establishment must be fully chilled in line with the current legislation prior to supply.

## **5. Comment**

Consumer - Same day.

FSA Comment - Typographical adjustments made.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

## **6. Comment**

FBO - Partially chilled offal should be included in the derogation/ existing Qurbani legislation.  
FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA's [risk assessment](#) highlights enhanced risks relating to offal. At present, there is no specific Qurbani legislation, just the chilling requirements set out in Retained EU Regulation 853/2004.

## **7. Comment**

Consumer - The need for a timely process.

## **FSA Response**

Comment noted.

## **8. Comment**

Consumer – People should attend and collect qurbani meat from farm house after slaughtering and cutting.

## **FSA Response**

This is outside the scope of this consultation. There is a strict regulatory framework that applies to the keeping and slaughter of animals in general, and to the home slaughter of livestock in particular and the latter is detailed in the [FSA's Home Slaughter Guidance](#).

## **9. Comment**

Consumer - Secularism. Ritual slaughtered meat should be consigned to [ ] history.

FSA Note: Comments received adjusted for reasons stipulated on page 2.

## **FSA Response**

The method of slaughter is outside the scope of this consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### **10. Comment**

Consumer - Inhuman slaughter needs to stop.

## **FSA Response**

The method of slaughter is outside the scope of this consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### **11. Comment**

Other - To improve meat hygiene during processing we would support any campaign or industry messaging to encourage farmers to supply clean animals that are destined for Qurbani.

## **FSA Response**

Comment noted.

### **12. Comment**

Other – The respondent (anonymised) would support the derogation accompanied by a set of agreed mitigation measures similar to those already agreed jointly between the FSA, industry and Muslim community representatives. Although we would expect these to be the subject of further consultation (especially considering the level of uncertainty noted in the risk assessment, and we would not like to see mitigations mandated for which there is no evidence they have any mitigatory effect), we anticipate they would include clear labelling requirements, and consumer advice and awareness information.

## **FSA Response**

Comment noted.

[Defra](#) are the responsible authority for Food labelling in England. Food labelling is also a devolved policy area and straddles the remit of multiple departments and agencies. FSA has policy responsibility for food safety and protecting consumer interests, which requires accurate food information. In Wales, the FSA has responsibility for compositional standards and labelling. Welsh Government is responsible for labelling as it relates to specific policies including animal welfare. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **Breakdown of responses and comments provided for the Question**

**In addition to the supply of Qurbani meat and offal during Eid al-Adha, are you aware of any other religious / cultural circumstances when time limited chilling of carcasses may be required?**

Responses received from	Number of responses (No)	Number of Responses (Yes)
Consumer	38 (62%)	6 (10%)
Food Business Operator	3 (5%)	0
Food Law Enforcement Officer	4 (7%)	2 (3%)
Other	6 (10%)	2 (3%)
Total	51 (84%)	10 (16%)

## **1. Comment**

Consumer - People do sometimes slaughter and share meat on the occasion of births – the word associated with this is Aqeeqah.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA is aware of the religious practice of Ageegah/Hagigah, however we understand that its fulfilment would not be precluded by the need for full chilling.

## **2. Comment**

Consumer - Aggegah meat on the 7th day after a baby has been born.

## **FSA Response**

Comment noted. The FSA is aware of the religious practice of Ageegah/Hagigah, however we understand that its fulfilment would not be precluded by the need for full chilling.

## **3. Comment**

FLEO - Ramadan feast. Plus the Muslim community have a culture of wanting their meat extremely fresh for example, straight after slaughter which I assume comes from times in hotter countries when there was little or no refrigeration so meat would spoil very quickly.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA recognise that Qurbani is a religious practice, however advice from Chief Imam and religious scholars is that the quick supply of the Qurbani meat is not a religious obligation.

## **4. Comment**

Consumer - Aqeeqah - After a child birth the slaughter should be on the 7th day and many would like to consume it on the same day.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA is aware of the religious practice of Ageegah/Hagigah, however we understand that its fulfilment would not be precluded by the need for full chilling.

### **5. Comment**

Consumer - Haqiqah, voluntary obligation(s).

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. The FSA is aware of the religious practice of Ageegah/Hagigah, however we understand that its fulfilment would not be precluded by the need for full chilling.

### **6. Comment**

Consumer - When a child is born, meat is provided in a similar way.

## **FSA Response**

Comment noted. The FSA is aware of the religious practice of Ageegah/Hagigah, however we understand that its fulfilment would not be precluded by the need for full chilling.

### **7. Comment**

FLEO - Kosher

## **FSA Response**

Comment noted.

### **8. Comment**

Other - Meat hygiene and human health are the most factors to consider according to Islam otherwise it will open multiple malpractices within whole chain system. FSA Comment - typographical adjustments made.

## **FSA Response**

Comment noted.

## **Comments provided for the Question**

**Please clarify any identifiable areas of interest that you consider have been missed within the agreed scope of the consultation.**

### **1. Comment**

## **FSA Response**

Comment noted. Advice is currently available on the [EID07](#). Consumer leaflet and [EID10](#) Consumer Leaflet on Offal on the [AHDB](#) website.

## **2. Comment**

Consumer - Consumer (sic.)

### **FSA Response**

Comment noted.

## **3. Comment**

FLEO - More needs doing regarding the transport methods of any derogated over temperature meat.

### **FSA Response**

Comment noted.

## **4. Comment**

Consumer - How is it that in today's age the needs of a British Muslim is being denied, we need government to support our needs.

### **FSA Response**

Comment noted, Engagement with the Islamic Scholars has and will continue to take place to ensure a proportionate, inclusive approach.

## **5. Comment**

Consumer - Secularism. Ritual slaughtered meat should be consigned to [ ] history.

FSA Note: Comments received adjusted for reasons stipulated on page 2.

### **FSA Response**

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **6. Comment**

**Consumer** - There does not seem to be any concern regarding the [...] practice of live slaughter.

### **FSA Response**

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## 7. Comment

The method of slaughter is outside the scope of this consultation. Defra are the responsible authority for the method of slaughter of animals in England. Welsh Government are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### FSA Response

Comment noted. Engagement with the Islamic Scholars has and will continue to take place to ensure a proportionate, inclusive approach.

## 8. Comment

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

### FSA Response

Comment noted. Engagement with the Islamic Scholars has and will continue to take place to ensure a proportionate, inclusive approach.

## 9. Comment

Other - Should be banned. FSA Comment - typographical adjustments made.

### FSA Response

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## 10. Comment

Consumer - Meat that is not humanely stunned before slaughter should be clearly labelled for the public to be fully informed and able to make an informed choice.

FSA Note: Comments reproduced in part for reasons stipulated on page 2.

### FSA Response

Comments noted.

[Defra](#) are the responsible authority for Food labelling in England. Food labelling is also a devolved policy area and straddles the remit of multiple departments and agencies. FSA has policy responsibility for food safety and protecting consumer interests, which requires accurate food information. In Wales, the FSA has responsibility for compositional standards and labelling. Welsh Government is responsible for labelling as it relates to specific policies including animal welfare.

However, the method of slaughter is outside the scope of this Consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales.

The FSA will share feedback on these subjects with Defra and Welsh Government as appropriate.

## **11. Comment**

Consumer - All animals should be fully stunned before slaughter.

### **FSA Response**

The method of slaughter is outside the scope of this consultation. [Defra](#) are the responsible authority for the method of slaughter of animals in England. [Welsh Government](#) are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **12. Comment**

Other - The respondent (anonymised) represents the interests of livestock producers in England and Wales and we recognise the importance of the domestic and export Halal market to the UK sheep sector. We are keen to promote British product within this market segment highlighting the quality, safety, traceability and high welfare standards that are in place.

### **FSA Response**

Comment noted. Export is outside of the scope of this consultation and these proposals only apply to the direct supply of Qurbani meat and offal during Eid al-Adha, to the final consumer in England and Wales.

## **13. Comment**

Other - If new legislation is proposed as a result of this consultation exercise, we feel that all the regulations and guidance around stunning should be reconsidered and clarified. Religious slaughter can take place without pre-stunning which imparts a risk to animal welfare. However, if on rare occasions a non-religious slaughter leads to a mis-stun, even with a very short delay before a re-stun, it can lead to dire consequences.

In the case of one of our members recently this situation shamefully led directly to the closure of a business. This was caused by the inexcusable ignorance of an OV as well as the overbearing, zero-tolerant and totally disproportionate general attitude of regulators to businesses, especially SME's.

In our experience, (anonymised) most customers like to know if they are consuming meat that has been pre-stunned or not.

There should be a simple addition to legislation requirements so that meat should have this status indicated. This would be a substantial improvement to consumer choice.

FSA Comment – typographical adjustments made.

### **FSA Response**

1. The method of slaughter is outside the scope of this Consultation.

[Defra](#) are the responsible authority for the method of slaughter of animals in England. Welsh Government are the responsible authority in Wales. The FSA will share feedback on this subject with Defra and [Welsh Government](#) as appropriate.

2. [Defra](#) are the responsible authority for Food labelling in England. Food labelling is also a devolved policy area and straddles the remit of multiple departments and agencies. FSA has policy responsibility for food safety and protecting consumer interests, which requires accurate food information. In Wales, the FSA has responsibility for compositional standards and labelling. Welsh Government is responsible for labelling as it relates to specific policies including animal welfare. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **14. Comment**

Other - The respondent (anonymised) would support the derogation accompanied by a set of agreed mitigation measures similar to those already agreed jointly between the FSA, industry and Muslim community representatives. Although we would expect these to be the subject of further consultation (especially considering the level of uncertainty noted in the risk assessment, and we would not like to see mitigations mandated for which there is no evidence they have any mitigatory effect), we anticipate they would include clear labelling requirements, and consumer advice and awareness information.

## **FSA Response**

Comments noted.

Current mitigations were proposed by industry and developed by QPWG SG members. Any future changes will follow the same development process.

None of the uncertainties in the [FSA's risk assessment](#) are related to the (industry led) mitigations. The uncertainties relate to data gaps, none of which would be reduced by further consultation, but require further research/evidence gathering.

[Defra](#) are the responsible authority for Food labelling in England. Food labelling is also a devolved policy area and straddles the remit of multiple departments and agencies. FSA has policy responsibility for food safety and protecting consumer interests, which requires accurate food information. In Wales, the FSA has responsibility for compositional standards and labelling. Welsh Government is responsible for labelling as it relates to specific policies including animal welfare. The FSA will share feedback on this subject with Defra and Welsh Government as appropriate.

## **Specific Questions for Food Business Operators**

Of the 3 Food Business Operators that responded to the consultation; 2 have agreed to participate in a further information gathering exercise should Option B be taken forward.

Comments provided for this Question - Please provide details on how the proposal to introduce a legislative change to allow a derogation (Option B) from the chilling requirements could affect your business (positive or negative).

## **1. Comment**

Positive impact as would lead to much greater customer satisfaction.

## **FSA Response**



Comment noted.

## 2. Comment

Cannot send meat to customers in time.

## FSA Response

Comment noted.

## 3. Comment

Negatively. It will create a two tier industry and unfair competition. It will also increase the risk of food related illness.

## FSA Response

Comment noted.

**Breakdown of responses provided for this Question – Additionally, please stipulate which type of business you represent (Large 250+ Full Time Equivalent staff (FTE), Medium 50-250 FTE, Small 10-49 FTE, Micro 1- 9 FTE)**

Responses	Numbers
Large 250+ FTE	0
Medium 50 to 250 FTE (2%)	1 (2%)
Small 10 to 49 FTE	0
Micro 1 to 9 FTE	2 (3%)
% of total respondents	3 (5%)

## Specific Questions for Food Law Enforcement Officers

**Comments provided for this Question – Please provide details on how Option B, the proposal to introduce a legislative change to allow a derogation from the chilling requirements would affect your work (positive or negative).**

## 1. Comment

Media campaign. Or reach out to Muslim bodies in the UK so they can disseminate information to the Muslim community.

FSA Comment – typographical adjustments made.

## FSA Response

Comment noted. The following Muslim accreditation bodies are members of the Qurbani Partnership Working Group: Halal Monitoring Committee (HMC); Halal Food Authority (HFA); and the Muslim Council of Britain (MCB). As part of the agreed partnership working, these bodies have been asked to raise awareness via their respective social media platforms.

## 2. Comment

Positive, this is because the AM (ante-mortem) and PM (post-mortem) inspection would be carried out and some hours of chilling before been dispatched to the individuals.

FSA Comment – typographical adjustments made.

## **FSA Response**

Comment noted. Any change in legislation would reduce the chilling time after ante mortem (AM) and post mortem (PM) inspections have taken place.

## **3. Comment**

We either keep and enforce the current legislation or rescind it.

## **FSA Response**

Comment noted.

## **4. Comment**

Very negative. Back to a system of two sets of regulations/standards.

## **FSA Response**

Comment noted.

## **5. Comment**

Any derogation should be scientific based, not religious based. We are here to look after the public health, not to prevent making FBOs unhappy. There are still legal provisions to opt in for partially refrigerated meat if meat needs to be partially refrigerated.

## **FSA Response**

Comment noted.

## **6. Comment**

Pressure by unscrupulous operators to push through production.

## **FSA Response**

Comment noted.

## **Breakdown of responses provided for this question:**

**Additionally, please stipulate whether you work for a Local Authority (LA), a FSA delivery partner or the FSA.**

Response	Numbers
FSA/FSA Delivery Partner in England	5 (8%)
Local Authority in Wales	1 (2%)
FSA/FSA Delivery Partner in Wales	0

Response	Numbers
Local Authority in England	0
% of Total Respondents	6 (10%)

## Actions to be implemented

These responses will help inform the FSA's next steps and will inform the decision on the future direction of the proposal.

Consideration will also need to be given to arrangements for the supply of Qurbani meat and offal during Eid al-Adha 2023 (commencing 28 June 2023 – date to be confirmed).

## List of respondents

This list does not include those respondents who asked for their response to be kept confidential or responses from individuals:

1. Pickstock Foods Ltd
2. Food Law Enforcement Officer – Local Authority in Wales
3. Food Law Enforcement Officer – FSA/FSA Delivery Partner in England
4. Organic Halal-Meat
5. Halal Certification Body and Experiences Professional (HCO Ltd)
6. National Farmers Union (NFU).
7. National Craft Butchers
8. Association of Independent Meat Suppliers (AIMS)
9. Campaigner on E. Coli O157
10. Advantage Sales
11. Responses from 44 members of the public and one Other (identifying as a UK resident) have been anonymised in the above tables.

**Note:** Some responses were not relevant to the subject of the consultation. They either expressed a negative view or were outside the scope of the consultation.

Note that this page contains updated responses from the FSA, reflecting advice on Qurbani.