

Proposal for a new regulation on the provision of food information to consumers

Response of the Scottish Council of Jewish Communities

We believe that consumers are entitled to a wide range of information about the food they buy, and we support regulation to ensure that it is provided in a format which is clear, reliable and relevant. We particularly welcome Article 7 of the EU proposal, which states that "*Food information shall not be misleading ... particularly as to the characteristics of the food and, in particular, as to its ... method of manufacture or production*".

Regulating use of the terms "kosher" and "halal"

We agree with the EU Impact Assessment statement that "*in considering any action on origin labeling the reasons for consumer demand for such labeling have to be taken into account*", and emphasise that religious reasons should be explicitly included in the list of "*justified reasons for wanting to know the origin of a product*" to leave no doubt that it is not among "*other reasons... [that] are not justified*." In addition the statement of General Objectives of the legislation should be amended to read "*The provision of food information shall pursue a high level of protection of consumers' health and interests by providing a basis for final consumers to make informed choices and to make safe use of food, with particular regard to health, economic, environmental, social, **religious**, and ethical considerations.*"

It is very important for the Jewish community that food should not be labeled 'kosher' unless the relevant Halachic (Jewish Law) requirements have been met, and we urge that regulations should not permit the approval of such labeling without prior consultation with and agreement from the appropriate Rabbinic authorities (as nominated by the Jewish community). We are, fortunately, not aware that there has been any mislabeling of non-kosher food as kosher in Scotland, or indeed in the UK. However the Muslim community has not been so fortunate, and many people were understandably distressed to learn that meat which they had purchased in December 2007 on the understanding that it was halal was, in fact, not halal.¹

We therefore support the contention in the FSA consultation paper that "*Tightening of the criteria for origin declarations provides a further safeguard against misleading consumers, as well as meeting the demand for additional information on the origin of meat through the food chain (i.e. born, reared and slaughtered).*"

Inappropriate and potentially dangerous labeling

Consequently, we are concerned that the inclusion of information indicating that meat has been produced by shechitah (the method of slaughter required for kosher meat

¹ Muslims accuse firm over supply of meat
http://www.theherald.co.uk/news/news/display.var.2060891.0.Muslims_accuse_firm_over_supply_of_meat.php

production) could be potentially misleading. Labeling meat which has been rejected from the kosher or halal market for technical religious reasons with the statement that it was produced for one of those markets, can only lead to consumers being misled. This is particularly likely for those for whom English is not their first language who will simply be looking for the word “kosher” or “halal”.

Furthermore, labeling should be entirely factual, and not in any way pejorative or critical, and should not distinguish such meat from that of other suppliers in a discriminatory or unfair manner. In view of his Ministerial responsibilities we are therefore particularly disturbed by recent public comments made by Lord Rooker in an interview with the Independent², in which he stated that "*the method of slaughter for meat ought to be on the label*" because he "*object[s] to the [kosher and halal] method of slaughter ... [since he] would want to buy meat that has been looked after and slaughtered in the most humane way possible.*" The Minister is, of course, entitled to his personal views, however ill-informed, but these should not be permitted to colour Government policy.

Discrimination

In recent years there have been a number of attacks on kosher butcher shops in the UK and we are concerned that inappropriately worded labeling about the method of slaughter could be exploited by extremist groups to identify further targets – and that comments such as Lord Rooker's reference to "*bloody halal meat*" may provide them with added incentive to do so.

We are unclear whether this was an unparliamentary epithet, or a clear signal of the Minister's ignorance of the fact that the very purpose of kosher and halal methods is to remove as much blood as possible from the meat, and are therefore concerned that the Minister's views may be based on an ill-informed stereotype. In fact animals destined for the kosher and halal markets are carefully tended, are not permitted to see other animals being slaughtered, are rendered instantaneously unconscious by a single cut of an extremely sharp blade, are dispatched by someone with years of technical and religious training, and, furthermore, could not be used if these exacting criteria were not met. This is in stark contrast to the mayhem and routine cruelty in many non-kosher slaughterhouses. That is why we question the motives of those who attack shechitah while ignoring the fact that 2.4 million animals are injured by mis-stunning in the UK each year – significantly more than the entire kosher market. If the Minister is genuinely motivated by concern for animal welfare, we expect therefore that he would wish labels to include information as to the proportion of animals mis-stunned prior to slaughter for the general market³ and on the risk to

² Halal and kosher meat should not be slipped in to food chain, says minister
<http://www.independent.co.uk/news/uk/home-news/halal-and-kosher-meat-should-not-be-slipped-in-to-food-chain-says-minister-805396.html>

³ The Slaughter of Food Animals, RSPCA Farm Animals Information leaflet, June 2007
<http://www.rspca.org.uk/servlet/BlobServer?blobtable=RSPCABlob&blobcol=urlob&blobkey=id&blobwhere=1109267162632&blobheader=application/pdf>

human health by BSE/vCJD through the use of captive-bolt stunning⁴.

Clarity

Since "*the main objectives of the legislation are to ... ensure consistency and clarity in the provision of information*", the introduction of information about the method of slaughter would have wide-ranging implications. As stated above, it is essential both that meat destined for the kosher and halal markets should be clearly and accurately labeled, and that meat that does not meet the requirements of those markets should not be labeled in a way that could mislead consumers.

In summary

We welcome the proposed legislation as a means to ensuring that consumers are provided with "*clear, simple, comprehensive, standardised and authoritative information*" (EU proposal). This should be provided in a manner that is compatible with Article 9 of the ECHR, facilitating the "freedom to manifest one's religion or belief, in worship, teaching, practice and observance", and not in a manner that denigrates religious practice.

Note: The Scottish Council of Jewish Communities (SCoJeC) is the representative body of all the Jewish communities in Scotland comprising Glasgow, Edinburgh, Aberdeen and Dundee as well as the more loosely linked groups of the Jewish Network of Argyll and the Highlands, and of students studying in Scottish Universities and Colleges. SCoJeC is Scottish Charity SC029438, and its aims are to advance public understanding about the Jewish religion, culture and community. It works with others to promote good relations and understanding among community groups and to promote equality, and represents the Jewish community in Scotland to government and other statutory and official bodies on matters affecting the Jewish community.

In preparing this response we have consulted widely among members of the Scottish Jewish community.

⁴ Dissemination of central nervous system tissue from the brain and spinal cord of cattle after captive bolt stunning and carcass splitting, DM Prendergast, JJ Sheridan, DJ Dalya, DA McDowell and IS Blair, Meat Science, December 2003