

Supply of Qurbani Meat and Offal during Eid al-Adha in England and Wales full consultation

Full consultation on the chilling requirements changes of Qurbani meat and offal supplied from slaughterhouses in England and Wales during the period of Eid al-Adha.

This consultation will be of most interest to:

- consumers (particularly the Muslim Community who consume Qurbani meat and offal)
- Muslim representatives
- slaughterhouse operators supplying Qurbani meat and offal
- butchers receiving/supplying Qurbani meat and offal
- food law enforcement officers
- meat Industry trade bodies

Consultation subject and purpose

The Food Standards Agency (FSA) is seeking views from stakeholders 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.

The scope of this consultation includes bovine (cows), ovine (sheep) and caprine (goats) carcase meat and associated red offal (liver, heart, lungs and kidneys) of those animals slaughtered at slaughterhouses in England and Wales during Eid al-Adha and directly supplied to the consumer or supplied via a butcher or wholesaler fulfilling existing orders from identifiable final consumers (referred to in this document as “direct supply”). Any other business-to-business transactions or supply are outside of scope. Qurbani meat and offal for the export market is also outside of scope.

This consultation focuses on the proposals detailed in this document and, subject to the outcome, a further consultation may take place to focus on implementation. This two-stage approach allows stakeholder engagement and contribution throughout the process.

Eid al-Adha is also referred to as the Festival of Sacrifice, a four-day Islamic holiday where animals are sacrificed and consumed as part of the celebration. Many Muslim consumers prefer to collect their Qurbani meat and offal as soon as possible after slaughter as this signifies the beginning of the festival. Only the meat from animals sacrificed during the festival qualify as fulfilling the religious obligation.

There is a clear regulatory framework in place that sets out chilling requirements for meat and offal which Food Business Operators (FBOs) must adhere to. This can prevent consumers from receiving their Qurbani meat and offal as soon as they would like because it can take several hours after slaughter for a carcase to reach the required core temperatures (7°C for a carcase and

3°C for offal).

How to respond

Responses are required by close **11 September 2022**. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation or company, including details of any stakeholders your organisation represents.

Please respond to the consultation via the [online survey](#). However, if this is not possible, you can email a response to meathygiene@food.gov.uk.

Following the end of this consultation, the responses received will be collated, analysed, and subsequently published on www.food.gov.uk. Comments made in response to this consultation will be considered when assessing the long-term approach to the direct supply of Qurbani meat and offal during Eid al-Adha. You can find information on how we handle data provided in response to consultations in our [consultations privacy notice](#).

Introduction

A list of abbreviations / acronyms can be found at Annex A.

This consultation seeks views from consumers, industry, enforcement authorities and other interested stakeholders on whether changes should be introduced to the chilling requirements of Qurbani meat and offal directly supplied from slaughterhouses in England and Wales during the period of Eid al-Adha.

The scope of this consultation includes bovine (cows), ovine (sheep) and caprine (goats) carcass meat and associated red offal (liver, heart, lungs and kidneys) of those animals slaughtered at slaughterhouses in England and Wales during Eid al-Adha and directly supplied to the consumer or supplied via a butcher or wholesaler fulfilling existing orders from identifiable final consumers (referred to in this document as “direct supply”). Any other business-to-business transactions or supply are outside of scope. Qurbani meat and offal for the export market is also outside of scope.

Muslim festival – Eid al-Adha/Eid of Qurbani

Eid al-Adha/Eid of Qurbani, also called the ‘Festival of the Sacrifice’, is the second of two Islamic holidays (Eid al-Fitr & Eid al-Adha) celebrated worldwide each year and considered the holier of the two. It honours the willingness of Ibrahim (Abraham) to sacrifice his son as an act of obedience to God's command. But, just before Ibrahim could sacrifice his son, God replaced him with a ram instead as the sacrifice. In commemoration of this intervention, an animal is sacrificed ritually and divided into three parts. This is a recommendation; the performer of the Qurbani can decide to donate the entire carcass to charity or may decide not to donate any meat at all. If shared, one share is given to the poor and needy, another is kept for home, and the third is given to relatives/friends. Eid al-Adha is celebrated on the tenth day of Dhul-Hijjah, the twelfth and final month of the Islamic calendar and traditionally lasts over the course of four calendar days.

The act of Qurbani (sacrifice) can only begin after Eid prayers on the first day of Eid al-Adha. Therefore, the earliest the first Qurbani slaughter can take place is approximately 30-45 minutes after sunrise in the abattoir's location. The latest slaughter/sacrifice time is sunset on the 3rd or 4th day of the festival (depending on the consumer's religious perspective). This relatively short window places significant demand upon those slaughterhouses supplying halal meat over this period.

Some Muslim consumers prefer to collect their Qurbani meat and offal as soon as possible after slaughter as this signifies the beginning of the festival. As it may take several hours for a carcase and offal to reach a core temperature of 7°C and 3°C respectively, adherence to the chilling requirements can prevent consumers from receiving their Qurbani meat and offal as soon as they would like.

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.

Current Legislation

Annex B provides a summary of all the relevant legislation.

The supply of meat and offal from the slaughterhouse to final consumers is subject to the requirements of retained [Regulation \(EC\) 852/2004](#).

The storage and transport requirements laid out in Section I, Chapter VII (storage and transport), Annex III of retained [Regulation \(EC\) 853/2004](#) (as amended) apply to all meat and offal produced in a slaughterhouse.

These require that meat sold to final consumers must be chilled to a core temperature of 7°C (carcase) or 3°C (offal) at red meat slaughterhouses.

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 suggests that it is possible to apply slaughterhouse carcase target temperatures higher than the currently mandated 7°C throughout the carcase (including the core), in combination with different transport durations, without resulting in additional bacterial growth. Based on the EFSA opinion and considering the assessment tools available, it is possible to introduce alternative, more flexible approaches for the temperature conditions during transport of fresh meat, in particular carcasses or larger cuts, without any increased public health risk or deviating from the basic principle that meat should be chilled to 7°C by a continuous decrease of temperature.

Retained [Regulation \(EC\) 853/2004](#) (as amended) allows for the partial chilling of meat transported from business to business, for example from a slaughterhouse to a butcher. It provides a derogation to the chilling requirements for carcase meat only, which enables meat to reach the consumer more swiftly after slaughter. These requirements were retained into UK law and remain effective. However, the existing flexibilities/derogations do not allow meat to be supplied to the final consumer other than fully chilled.

Enforcement of food hygiene regulations falls to the Competent Authority (CA). In England and Wales, the CA is dependent on the type of establishment, the FSA is CA for all slaughterhouses. Any establishment operating as a food business and approved by the FSA/Local Authority (LA) or registered with the LA must adhere to the food hygiene regulations.

Slaughterhouses in England and Wales are approved by the FSA, however Qurbani meat may be supplied to consumers via butchers and wholesalers which are regulated by the LA.

The Qurbani Partnership Working Group Sub-Group (QPWG SG) and development of mitigations

In 2019, a sub-group of the FSA/Industry Partnership Working Group was formed (the QPWG SG) to consider the supply of Qurbani meat and offal to the final consumer directly from the

slaughterhouse.

The QPWG SG is a United Kingdom (UK)-wide group comprising of meat industry trade bodies, FBOs, Muslim certification organisations (Halal Monitoring Committee (HMC) and Halal Food Authority (HFA)), the Muslim Community, LAs, FSA and Food Standards Scotland veterinary and policy advisors. A full list of organisations represented within the group is provided at Annex C.

In 2020, industry representatives proposed a number of mitigations (principles) for implementation during Eid al-Adha for the FSA to consider in order to allow FBOs 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 FSA decided to take a proportionate approach to the enforcement of the chilling requirements for Qurbani meat and offal supplied less than fully chilled. The approach to enforcement was supported by several industry led risk mitigations implemented by FBOs. These mitigations, which include partial chilling, improved traceability, minimisation of cross-contamination and consumer advice to accompany the products are implemented for the four days following the commencement of Eid al-Adha.

The FSA commissioned a risk assessment (RA) to evaluate if there was any additional risk to consumers as a result of the supply and consumption of less than fully chilled Qurbani meat and offal during Eid al-Adha.

Using data collected from FBOs, Official Veterinarians (OVs) and the public, the resulting “[Assessment of the risk to consumers as a result of disruption to the cold chain during direct supply of Qurbani meat and offal](#)” has found:

- the main pathogens of concern are non-typhoidal *Salmonella enterica*, Shiga toxin-producing *Escherichia coli*, and *Clostridium perfringens* due to their potential presence and growth in beef, lamb and goat meat.
- the risk assessment considered information gathered from surveys targeting food business operators, official veterinarians and consumers as well as published scientific data on the pathogens.
- in the typical scenario, which is the most likely outcome based on the collected data, there is no significant difference in risk to consumer health, and the risk level was established as Very Low (“very rare but cannot be excluded”).
- in a reasonably foreseeable worst-case scenario, *Salmonella* species and Shiga toxin-producing *Escherichia coli* levels may increase by 10 to 100-fold per gram, presenting an increased risk to the consumer. This risk level was established as Low (“rare but does occur”).
- the assessment concluded that significant uncertainties still remained, 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.

Given these findings, the FSA has decided to continue the use of the industry led mitigations in 2022 whilst a long-term approach is developed.

The RA, outcomes from this consultation exercise, and the work of the QPWG SG to date will inform the FSA's long-term approach to the direct supply of Qurbani meat and offal.

A consolidated list of industry led mitigations that will be implemented during Eid al-Adha in 2022 has been published on the [Agriculture and Horticulture Development Board \(AHDB\) website](#).

Main Proposals

The FSA is seeking to gather feedback 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.

In addition to views on the options above we would also like to hear feedback on:

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

Please see Engagement and consultation process section for the specific questions asked in this consultation.

Impacts

The FSA 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. Should Option A (as detailed above) be taken forward, the current flexible approach to enforcement will be phased out.

Should Option B (as detailed above) be taken forward, the FSA would seek to introduce a statutory derogation from the chilling requirements for Qurbani meat and offal.

The FSA has not included a full Business Impact assessment in this consultation. A full assessment of the costs and benefits to consumers, industry, local authorities, and Government of any future legislative changes will be provided should this approach be taken forward.

A summary of the expected impact to consumers and industry as a result of the industry-led mitigations that took place from 2020-21 and that will take place in 2022 has been provided at Annex D. Any further information on the costs and benefits experienced is welcomed to inform future impact assessments.

Engagement and consultation process

Engagement with the QPWG SG has been ongoing since 2019 and the group is supportive of the FSA launching this consultation.

This consultation seeks to gather views of wider stakeholders for example consumers, industry, enforcement authorities and other interested parties who have not yet had the opportunity to feedback their opinions in relation to the supply of Qurbani meat and offal during Eid al-Adha in England and Wales.

Questions asked in this consultation:

(Please state in your response whether you are located in England or Wales)

Questions for all:

- to progress this work we would welcome your views on the following two options: (Please provide as much information / reasoning for your response.)

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.

- please provide any details/suggestions on additional mitigations or flexibilities that you feel should be considered.
- 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?
- please clarify any identifiable areas of interest that you consider have been missed within the agreed scope of the consultation.

Specific question for Food Business Operators:

- please provide details on how Option B, the proposal to introduce a legislative change to allow a derogation from the chilling requirements could affect your business (positive or negative)
- 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)

Request to FBO's - please provide your contact details if you are willing to participate in future information gathering surveys to help us assess the impact of this proposal.

Specific question for Food Law Enforcement Officers:

- 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)
- additionally, please stipulate whether you work for a LA, a FSA delivery partner or the FSA.

Please explain your answers clearly and provide evidence where possible.

Responses

Responses are required by close **11 September 2022**. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company, including details of any stakeholders your organisation represents.

Please respond to the consultation via the [online survey](#). However, if this is not possible, you can email a response to meathygiene@food.gov.uk.

Following the end of this consultation, the responses received will be collated, analysed, and subsequently published on www.food.gov.uk. Comments made during the consultation will be considered when assessing the long-term approach to the direct supply of Qurbani meat and offal during Eid al-Adha.

Ministers in all four nations have agreed to a provisional common framework for food and feed safety and hygiene. This consultation has been developed under the commitment to collaborative four-nation working set out in this framework. The content of this consultation represents the views of FSA and the factors that FSA has identified as relevant to this proposal.

For information on how the FSA handles your personal data, please refer to the [Consultation privacy notice](#).

Further information

This consultation has been prepared in accordance with [HM Government consultation principles](#).

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours,
Rebecca Sudworth
Director of Policy, FSA

Annexes

Annex A

Abbreviations	Acronyms
AHDB	Agriculture and Horticulture Development Board
CA	Competent Authority
DAERA	Department of Agriculture, Environment, and Rural Affairs
EC	European Community
EFS	European Food Safety Authority
EU	European Union
FBO	Food Business Operator
FSA	Food Standards Agency
FTE	Full Time Equivalent (staff)
HFA	Halal Food Authority
HMC	Halal Monitoring Committee
LA	Local Authority
OV	Official Veterinarian
QOP	Qurbani Operating Procedure
QPWG SG	Qurbani Partnership Working Group Sub-Group
RA	Risk Assessment
UK	United Kingdom

Annex B: Legislation

Retained [Regulation \(EC\) No 852/2004](#) laying down general food hygiene rules applicable to all registered and approved businesses. The regulation sets out objectives for good hygiene practices to protect consumers.

Retained [Regulation \(EC\) No. 853/2004](#) laying down specific hygiene rules for food of animal origin (as amended).

Retained [Commission Regulation \(EU\) 2017/1981](#) of 31 October 2017 amending Annex III to Regulation (EC) No 853/2004 of the European Parliament and of the Council as regards temperature conditions during transport of meat.

Retained [Regulation \(EU\) 2017/625](#) on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products.

Retained [Commission Regulation \(EU\) 2019/624](#) concerning specific rules for the performance of official controls on the production of meat and for production and relaying areas of live bivalve molluscs in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council.

Retained [Commission Regulation \(EU\) 2019/627](#) laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625.

[Food Safety and Hygiene \(England\) Regulations 2013](#) which include the enforcement provisions in England.

[Food Hygiene \(Wales\) Regulations 2006](#) and the [General Food Regulations 2004](#) which include the enforcement provisions in Wales.

Annex C: Membership of the QPWG SG

- Agriculture and Horticulture Development Board (AHDB)
- Association of Independent Meat Suppliers (AIMS)
- British Meat Processors Association (BMPA)
- Department of Agriculture, Environment and Rural Affairs (DAERA)
- Dunbia
- Euro Quality Lambs
- Food Standards Agency (FSA)
- Food Standards Scotland (FSS)
- Halal Food Authority (HFA)
- Halal Monitoring Committee (HMC)
- Muslim Council of Britain (MCB)
- Wakefield Council

Annex D: Summary of expected impact to consumers and businesses

Costs to consumers

The additional costs to consumers of the mitigations are expected to be small. However, the direct supply of Qurbani meat and offal to consumers is not risk-free.

There may have been a marginal increase in the number of foodborne diseases as a result of the failure to fully chill Qurbani meat and offal as highlighted in the RA. As a result, in addition to any pain and suffering caused, consumers may have experienced lost earnings if they were unable to work, alongside other costs.

Consumers may also have experienced an increase in travel costs associated with the collection of less than thoroughly chilled Qurbani meat and offal directly from slaughterhouses, rather than awaiting receipt of thoroughly chilled Qurbani meat and offal from the butcher through whom the Qurbani was pre-booked.

Costs to businesses

A number of documents were produced as part of the mitigations, to support the safe production and consumption of Qurbani meat and offal. These 11 documents were published on AHDB's website and included:

- consumer information leaflet
- consumer declaration forms
- Qurbani operating procedures, including guidance on transportation requirements, chilling requirements and documentation of carcasses for traceability.

Many industry representatives dedicated staff time and other resources into developing the mitigations. Food business operators (FBO's) wishing to supply less than thoroughly chilled Qurbani meat and offal were required to familiarise themselves with all published advice and guidance documentation surrounding the mitigations. These FBO's may have faced additional costs to ensure they comply with Qurbani operating procedures, for example, in terms of packaging requirements and ensuring that consumer declarations are completed.

As the mitigations allow throughput to increase to meet demand over the Qurbani period, businesses may have incurred additional costs if staff were required to work overtime to process the necessary number of carcasses.

The risk of any disease incident caused by less than thoroughly chilled Qurbani meat or offal is deemed to be low, however if employees are unable to work as a result of contracting food borne disease employers may have incurred indirect costs of productivity losses.

Benefits to consumers

Under the industry led mitigations, consumers were able to collect their Qurbani meat and offal shortly after slaughter, benefitting fully from the religious and cultural significance of Qurbani. Ultimately, this is likely to have led to increased consumer satisfaction.

Through allowing Qurbani meat to be supplied without undergoing the usual chilling requirements, the mitigations could have helped to reduce the incidence of illegal or home animal slaughtering and by-product disposals, which is likely to lead to a reduction in the number of foodborne diseases.

The industry led mitigations could have helped to reduce instances of Qurbani fraud, by reducing the need to sell meat prepared ahead of Eid prayers (and before dawn) as Qurbani meat, to meet consumer demand. The mitigations required that the time and date to be printed on the Qurbani carcass tag, thus allowing consumers to verify their Qurbani purchase.

Benefits to businesses

The beneficial effect to businesses who supply Qurbani meat and offal is that there is increased productivity during this period which is to meet the demands of the Muslim community. In addition, it is understood that due to the supply and demand, the price of ovine (sheep) as the species predominantly supplied, increases significantly during this time.

The demand for Qurbani meat and offal means that both the price and slaughterhouse throughput rise during this period, generating higher profits for suppliers.

The proportionate approach to enforcement of the chilling requirements enabled slaughterhouses to manage larger volumes than usual. If Qurbani meat does not require chilling to the temperatures dictated by the legislative requirements, it spends less time on slaughterhouse

premises, thereby enabling higher levels of throughput.

The proportionate approach to enforcement of the chilling requirements enables businesses to make significant savings on their per-unit chilling cost, depending on the type and capacity of the chilling system used. This combination of increased demand, higher prices, and lower unit costs (due to the reduced chilling requirements) contribute to increased profits for businesses during the Qurbani period.