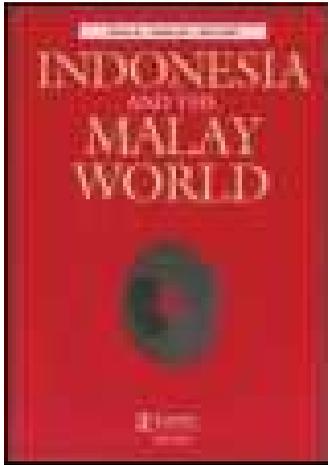


This article was downloaded by: [24.207.133.97]

On: 09 March 2015, At: 07:18

Publisher: Routledge

Informa Ltd Registered in England and Wales Registered Number: 1072954 Registered office: Mortimer House, 37-41 Mortimer Street, London W1T 3JH, UK



Indonesia and the Malay World

Publication details, including instructions for authors and subscription information:

<http://www.tandfonline.com/loi/cimw20>

The Question Of Animal Slaughter In The British Straits Settlements During The Early Twentieth Century

Nurfadzilah Yahaya

Published online: 05 Mar 2015.



CrossMark

[Click for updates](#)

To cite this article: Nurfadzilah Yahaya (2015): The Question Of Animal Slaughter In The British Straits Settlements During The Early Twentieth Century, *Indonesia and the Malay World*, DOI: [10.1080/13639811.2015.1014685](https://doi.org/10.1080/13639811.2015.1014685)

To link to this article: <http://dx.doi.org/10.1080/13639811.2015.1014685>

PLEASE SCROLL DOWN FOR ARTICLE

Taylor & Francis makes every effort to ensure the accuracy of all the information (the "Content") contained in the publications on our platform. However, Taylor & Francis, our agents, and our licensors make no representations or warranties whatsoever as to the accuracy, completeness, or suitability for any purpose of the Content. Any opinions and views expressed in this publication are the opinions and views of the authors, and are not the views of or endorsed by Taylor & Francis. The accuracy of the Content should not be relied upon and should be independently verified with primary sources of information. Taylor and Francis shall not be liable for any losses, actions, claims, proceedings, demands, costs, expenses, damages, and other liabilities whatsoever or howsoever caused arising directly or indirectly in connection with, in relation to or arising out of the use of the Content.

This article may be used for research, teaching, and private study purposes. Any substantial or systematic reproduction, redistribution, reselling, loan, sub-licensing, systematic supply, or distribution in any form to anyone is expressly forbidden. Terms &

Conditions of access and use can be found at <http://www.tandfonline.com/page/terms-and-conditions>

Nurfadzilah Yahaya

THE QUESTION OF ANIMAL SLAUGHTER IN THE BRITISH STRAITS SETTLEMENTS DURING THE EARLY TWENTIETH CENTURY*

WINNER

2014 YOUNG SCHOLARS COMPETITION

Colonial law empowered British authorities to attempt to intervene in religious affairs. Rather than creating an atmosphere of open fruitful debate, colonial legal structures prevented useful discussions from occurring between colonial authorities and Muslim subjects that could lead to mutual understanding and useful consensus. In 1929, a Muslim butcher in the British Straits Settlement of Penang was fined in a British colonial court for causing unnecessary cruelty to a fowl, despite his claim that he had slaughtered the animal according to the proper Islamic method. The case forced the issue of religious slaughter into the public sphere, and sparked intense debates in the public press on the viability of Islamic method of animal slaughter. For Muslim subjects, animal slaughter was definitely a deeply religious issue. After all, the domain of the religious, generally envisioned as 'private' in British colonial imagination, enabled Muslim participation in the public sphere and civil society. Yet, religion sometimes fell out of the frame of discussion. Animal welfare groups robustly advocated stunning by electricity as a more effective, more humane method of slaughter. Other considerations such as general hygiene of slaughterhouses and economic considerations also played a large role in colonial intervention in animal slaughter since the early 20th century. British colonial policy put Muslim subjects on the high defensive that led to the stultification of transformations that were unlikely to stem from British colonial initiative. When discussions became acrimonious, colonial authorities would stifle dialogue by casting the issue as a religious one, thus removing it as a topic of sustained conversation.

Keywords: slaughter; animals; Singapore; Penang; British; colonialism

*Drafts of this article have been presented at the Law and Society Association (San Francisco, June 2011); Institute for Global Law and Policy organised by Harvard University Law School (Qatar, January 2013); Annual Southeast Asian Studies Symposium, University of Oxford (March 2013); Animal Studies Conference, University of Chicago (April 2014); Islamic Religious Council of Singapore (July 2014); and SIAS Summer Institute, National Humanities Center in Chapel Hill, North Carolina, USA (August 2014). The author thanks participants at these meetings for their comments, and expresses special thanks to the two anonymous IMW reviewers, and to Iza Hussin, C.S. Adcock and Nancy Reynolds for their guidance.

Introduction

Through the lens of a high profile legal case involving animal slaughter in the British colony of the Straits Settlements in 1929, this article examines the relationship between colonial law and religion.¹ On the one hand, the domain of the religious, generally envisioned as 'private' in British colonial imagination, enabled participation of colonial subjects in the public sphere and civil society who were very keen on protecting their limited purview.² On the other hand, unequal power structures inherent in colonialism meant that reform of religious laws was difficult to enact within a system of juristic legal pluralism that was organised hierarchically in which the colonial state dominated other subordinate legal regimes.³ Few Muslim subjects possessed the authority to enact change within this framework. They were usually allied with the colonial elite in government agencies such as the Mohamedan Advisory Board, and were therefore regarded with suspicion by other Muslims. This perception undermined their ability to determine the direction of reform. Furthermore, Muslim subjects who were not allied with the colonial elite did not possess much clout to enact change, and could only express their discontentment in the public sphere. Change in religious laws forcefully imposed by the British colonial elite neither led to progressive social change, nor better relationships between different constituents in the colony. Rather, such attempts often led to the intensification of religious tension in the colony.

While scholars have discussed the intense debates on family law reform during the colonial period,⁴ matters outside of family law have not been examined at length. Slaughter of animals by Muslims, though outside the purview of family law, were subjected to Islamic law as well. However, unlike family law, laws governing animal slaughter were not defined, and were therefore subject to controversy.

While colonial authorities attempted to intervene in religious affairs, they stymied open critical discussions with Muslim subjects by manipulating the general policy of 'non-interference in religious affairs' which did not actually prevent colonial authorities from intervening in Islamic law throughout the empire in the first place.⁵ Yet, any issue deemed 'religious' was considered off-limits as topics of open discussion for fear of offending colonial subjects even as intervention into religious affairs continued to take place throughout the colonial period.⁶ This article demonstrates this

¹The Straits Settlements, a Crown Colony since 1867, consisted of Penang, Malacca, Singapore and the Dindings. In 1907, Labuan on the north coast of Borneo became part of the Straits Settlements.

²This occurred in British India as well, see Beverley (2011: 155–82).

³According to anthropologist Sally E. Merry (1988: 871), a legal system is pluralistic in the juristic sense when the sovereign commands different bodies of law for different groups of the population varying by ethnicity, religion, nationality or geography, and when the parallel legal regimes are all dependent on the state legal system. See also Benton (2002: 3–11).

⁴See Anderson (1968: 221–34); Brown (1997); Deguilhem (1995, 2004); Doumani (2003); Moors (1999: 141–77).

⁵In British India for example, colonial law transformed the regulation of property previously bound by Islamic law and Hindu law, see Birla (2009); Kozłowski (1985).

⁶This was mainly due to the fact that the category of 'religion' was not well defined. See Sullivan et al. (2011).

double move by examining reports of a case of animal cruelty committed by a butcher in July 1929.

The case

On 24 July 1929, an Indian Muslim shopkeeper and butcher, Naina Mohamed bin Kader Mastan, was convicted for cruelty to animals in connection with the killing of a fowl (*Straits Times*, 1930a). British Senior District Officer, Captain Edward Pratt, had paid a surprise visit to the market two weeks before, and discovered that Naina Mohamed had cut the throat of a domestic fowl ineffectively. The chicken was found conscious by Pratt with its throat slit.⁷ He observed that the bird's eyes were open, which he took to mean that the bird was 'clearly sensible' (*Straits Times*, 1930b, 1930c). The magistrate presiding over the case surmised from Captain Pratt's vivid description that this was not a mere reflex action of the muscles normally observed when a fowl was decapitated (*Straits Times*, 1930d). The fowl was, in other words, merely wounded and was slowly bleeding to death. Pratt swiftly ordered the Conservancy Inspector accompanying him to kill it instantly to end its agony. Naina Mohamed then came forward to claim the fowl as his although it was not he who decapitated it. He told Pratt that his chickens often take ten minutes to die by his method of slaughter anyway. For causing 'unnecessary cruelty' to an animal, Naina Mohamed was found guilty and fined \$25 – a hefty amount in those days and larger than his annual income.⁸ He appealed against the sentence on the grounds that it was excessive.⁹ The guilty verdict was upheld however, and it caused a stir amongst Muslim subjects in the region who swiftly rose to defend the actions of Naina Mohamed, and the practice of Islamic slaughter in general. This prompted British legal authorities in the Crown Colony of Straits Settlements to emphasise to the Muslim public that the colonial government did not intend to dispute the halal Islamic method of slaughter in the conviction of Naina Mohamed. Rather, they stressed that the legal case at hand strictly revolved around Naina Mohamed's unsuccessful attempt to slaughter a chicken till dead causing it to suffer unnecessarily.

For the meat of an animal to be halal, i.e. legally permissible, the animal has to be slaughtered according to the prescribed ritual method known as 'dhabihah'. There are four basic requirements (Bearman et al. 2014; Wheeler 2013). The animal has to be

⁷Incidentally, in 1925, Captain Pratt's wife offered her services to the Malayan Agri-Horticultural Association specifically for the prevention of cruelty to animals (*Straits Times*, 24 October 1925).

⁸The notion of 'necessary cruelty' was not explained by British authorities. For an interesting discussion of 20th-century notions of 'necessary pain' towards humans and torture, see Talal Asad (1997: 285–308).

⁹The offence was punishable under Section 7 of Ordinance 77 (Cruelty to Animals) which made him liable to a monetary fine, imprisonment or both. This Section stated that any person who cruelly beats, ill-treats, tortures, over-drives, or causes or procures to be beaten, ill-treated, tortured, over-driven or over-laden, any animal, shall be liable to a fine not exceeding one hundred dollars or to imprisonment of either description for a term which may extend to three months (*Laws of the Straits Settlements*, 1920, II: 73–5).

alive and healthy, and slaughtered by a Muslim in the name of God.¹⁰ The animal's throat must be cut by a sharp knife in order to cause minimal pain; the carotid artery, jugular vein and windpipe must be severed in a single swipe. Blood must be completely drained out of the carcass.

The courtroom trial of Naina Mohamed effectively moved the issue of (lawful) animal slaughter from the realm of religious discourse to that of public welfare. The image of a chicken suffering from an unsuccessful cut managed to spark and augment the motivational energy of those who already held ethical principles to engage more tangibly with the actual practice of ethical behaviors with regards to animal welfare. Animal welfare became a common concern between Muslim subjects and British colonialists from the mid 1920s onwards.¹¹ Yet, this rare confluence of interests did not lead to any meaningful resolution. Serious engagement with the issue of animal welfare was thwarted by existing colonial structures which did not encourage open channels of communication about religious matters. The lack of a robust centralised forum for dispute resolution involving religious affairs meant that the British colonial court was the only viable forum for discussion. However, colonial legal forums were characteristically combative spaces that were not conducive to civic engagement especially during trial proceedings. Courtroom trials skewed discussions concerning animal welfare by imbuing it with a wary and mistrustful tone on both sides.

Policy of non-interference

Since the introduction of the Mohamedan Marriage Ordinance by the Legislative Council on 1 December 1882 in the Straits Settlements, British colonial courts applied blanket legal authority over all cases involving Personal Law which concerned marriage, divorce, inheritance and guardianship of minors in the Straits Settlements.¹²

¹⁰There are however slight differences amongst the four Sunni schools of Islam and between Sunni and Shi'a. See Cook (1984: 449–67; 1986: 217–77); Freidenreich (2011: 131–43).

¹¹British approaches to animal welfare in empire were historically fraught with racism and prejudice. For an example of the relationship between issues of animal cruelty and British punishment of colonial subjects in Kenya, see Ferguson (1998); Kean (1998); Shadle (2012: 1097–116); Turner (1980). For more on the SPCA specifically, see Ritvo (1987).

¹²In March 1877, the general incompetence of local religious authorities comprising 143 Muslim inhabitants of Singapore presented the Governor with a petition to request for legislation on the subject of Muslim marriage and divorce. The memorialists recommended that a qadi be appointed by the 'Mahomedan Registrar' under the control of the Registrar General with functions and duties similar to the Mahomedan Registrar constituted by the Bengal Act No. 1 of 1876. On 27 August 1880, an ordinance was passed 'to consolidate and amend the law relating to Mahomedans, and to provide for the registration of marriages and divorces among Mahomedans'. It led to the establishment of a centralised marriage registrar and the official recognition of local officials (qadi) to solemnise marriages by the colonial government. As a result of this ordinance, the local qadi no longer had the power to judge cases (*Acts and Ordinances, 1898*: 222–3).

The adjudicatory powers of a local qadi in these cases involving religious laws were revoked thereafter. British judges presided over all cases involving Islamic law. This meant that British judges decided what Islamic law actually comprised – a process that was permeated by cultural mistrust and problematic translations.¹³ Despite taking on the full mantle of legal authority, British authorities remained wary and uneasy about their direct involvement in matters they classified as ‘religious’. This unease prompted British authorities to remove religious issues from being made the focus of sustained dialogue in public forums.

The policy of non-interference in religious affairs dated back to the aftermath of the Sepoy Rebellion, also known as the First Indian War of Independence (1857–1858).¹⁴ In the aftermath, Queen Victoria took control of India from the East India Company and guaranteed religious toleration to all Indian subjects.¹⁵ Certain issues were henceforth designated ‘religious,’ a coherent and bounded category.¹⁶ However, the issue of animal slaughter challenged any discrete notion of ‘religion.’¹⁷ Scholars of British India have shown how colonial authorities claimed to avoid interfering in religious affairs while actually transforming religious laws in significant ways (Birla 2009; Cohn 1996; Sturman 2012). The process of codification of Islamic law in India during the late 18th century drastically transformed Islamic legal practice for example.¹⁸ In contrast to extensive British legal codes of Personal Law which consisted almost exclusively of family law, laws on religious slaughter of animals were not codified and therefore less familiar to British legal authorities and subjects in the Straits Settlements. While Islamic law held sway over family affairs in the colony, it was certainly not given priority over municipal law in the matter of animal slaughter. However, animal slaughter was not formally legislated in the colony beyond general rulings about the hygiene of abattoirs and slaughterhouses. Due to this gap in legislation, Muslim subjects could potentially assert

¹³British judges in India had started doing this in 1772. Mitra Sharafi (2014: 130) warns of the ‘codification fallacy’ that scholars often fall into.

¹⁴In 1857, Indian frustration expressed itself in a widespread revolt against British authorities in which Muslims and Hindus joined together. British authorities crushed opposition severely and officially ended Mughal rule. In the aftermath of the rebellion, Queen Victoria proclaimed on 1 November 1858 that ‘we do strictly charge and enjoin all those who may be in authority under us that they abstain from all interference with the religious belief or worship of any of our subjects on pain of our highest displeasure’. ‘Proclamation by the Queen in Council to the princes, chiefs, and people in India’ (Keith 1922: 382).

¹⁵In some places such as in the Federated Malay States on the Malay Peninsula, British authorities instituted a system of ‘indirect rule’ which involved deferring to local authority, in order to rule plural societies in colonies more efficiently (see for example, Emerson 1937).

¹⁶Scholars of religion such as Asad (2003), Sullivan (2005) and more recently Agrama (2012), have demonstrated that a separation between law and religion is impossible especially since the state establishes itself as the sole arbitrator entrenching itself more deeply in the social fabric and intimate domains of everyday life.

¹⁷Scholars have demonstrated how this policy affected religious practice in South Asia to a significant extent especially since English Common Law was the imperial basis for all realms of law. Religious laws were transformed partly through the reification of custom. See Adcock (2014: 31–3); Dirks (1993); Sturman (2012: 109–238).

¹⁸For more on codification, see Kolsky (2010: 69–107); Kugle (2001: 257–313).

their own laws. However, debates surrounding the issue of animal slaughter demonstrated that even when there was no legislation, state law was still capable of governing social life.

The issue of animal slaughter was cast by British authorities as a problem of public hygiene, lack of maintenance of municipal and port facilities, as well as high transportation costs of live animals. In addition, since the late 19th century, colonial authorities had been concerned about religious conflicts between Hindus and Muslims in British India that arose out of Hindu resentment of Muslims' slaughter of cows in public places – animals regarded as sacred by Hindus.¹⁹ While no overt unrest between the two communities occurred in the Straits Settlements, colonial authorities were always mindful of potential violence between Hindu and Muslim communities. Though largely a matter of religious ritual in the Muslim world, religious slaughter of animals gradually became characterised as a non-religious issue from the early 20th century onwards, and therefore qualified to be open to colonial intervention in the British colony. Nonetheless, as debates about religious slaughter of animals got under way in the public press in the 1920s and 1930s, British authorities often reversed their position by underscoring the issue as a religious one instead. In other words, although religious slaughter was at times reconfigured as a matter of public welfare, outside the realm of 'religion,' it frequently slipped back into the category of 'religious'. British colonial authorities abruptly truncated ongoing dialogues in the public press about religious slaughter of animals so as not to rile Muslim subjects in the Straits Settlements and Malaya such that by 1931, the case of the butcher was no longer addressed in the public press. Evidently, colonial officials held the general opinion that Muslim subjects were incapable of having rational discussions about religious matters.

The experts

While the Magistrate Court only addressed Naina's error on that fateful July morning, the Court of Appeals cast the issue as a religious one. Judge Percy Sproule made a marked effort not to appear blatantly presumptuous in judging the correctness of Islamic practice. Local religious experts and a medical expert were summoned to the Court of Appeals to remark upon the proper Islamic method of slaughter. In the Court of Appeal in Butterworth in January 1930, two Muslim religious experts were called to give evidence before Judge Sproule (*Straits Times*, 1930e). The first was Sheik Abdulla Maghribi, a religious teacher who was said to be 'acquainted intimately with the Qur'an, and with the scriptures'.

(T)he fowl must be cut at the throat, and under the throat the food passage, and two other arteries. The windpipe is called the 'halkum' and the food-pipe is the 'Muri.' The arteries at the side of the neck are called the 'Wadejian.' The instrument used for the process must be a sharpened knife. The proper ceremony described is as follows:

¹⁹*Straits Times Weekly Issue*, 22 August 1893, p. 2; *Malayan Saturday Morning Post*, 30 August 1924, p. 16. For more on social unrest due to the slaughtering of cows and the efforts of the Cow Protection Movement, see van der Veer (1994: 78–105); Yang (1980: 576–96).

The knife must be sharpened and faced towards the west. The knife should be held by the right hand. With the left the head of the fowl should be held grasping the throat, food-pipe and the two 'Wadejian' artery. The name of God should then be uttered in Arabic form. The cutting is then effected by severing the throat, the wind-pipe and the 'Wadejian' arteries quickly. After doing this the fowl is laid down on the ground. The significance of this action is to give ease to the fowl by letting it down. If held, the animal continues to struggle and so would suffer. Secondly, the blood which escapes from the fowl cannot be eaten and by letting the fowl down the blood pours out more rapidly. If the fowl is retained in the hand some of the blood may not come out.

Also the fowl has a soul. This is another reason for placing it on the ground – the soul of a fowl can in this way escape more easily. By holding the fowl in the hand after cutting, one is pursuing an inferior method, because the blood does not flow out so well. This method of killing is prescribed in the Mohamedan books. I know the book of Fathul Mabin dealing with the religion. The book exhibited is the one in question. The passage dealing with the evidence is on page 43. If the fowl's head is completely cut off it is generally held that it cannot be eaten. I know the book of Aiiman Ibinilarabi. It is stated in this book that it is illegal for the head to be cut off.

(Straits Times, 1930f)

Sheik Abdulla Maghribi emphasised the importance of inflicting minimal suffering on the fowl in the process of slaughter.

According to Mohammedan law it is wrong to eat flesh with blood and to avoid this a knife must be used. It is also a part of the Mohamedan law to let it out so that it will cause the least possible suffering to the bird. The method I have described brings this about best. It drains the blood from the head and when this happens the bird ceases feeling pain. The cut is to be in the middle or just under the thyroid cartilage. The arteries I have referred to are the carotid arteries. The windpipe, gullet, vein on each side are all that must be cut.

(Straits Times, 1930f)

The second witness, Mohamed Sali, a school teacher living in Penang, served a minor role compared to the Sheik Abdulla Maghribi. He affirmed that the food passage and the breathing passage and the two veins on either side must be severed. He added that he had never heard that it would be more virtuous to cut any further veins. Mohamed Sali's last remark implied that religious expert testimonies in the Court of Appeal were meant to determine the proper blood vessels to be cut that would entail minimal suffering according to Islamic law.

In order to ascertain how the Islamic method actually strove to minimise animal suffering during slaughter, the court called upon a medical officer, Dr Ernest Victor Lupprian, to access the statements of the religious experts that preceded him.²⁰ Lupprian's statement touched only on the religious experts' biological knowledge

²⁰During cross-examination, Lupprian admitted that he was not a veterinary surgeon, and did not pose as an expert on animals, but was 'pretty well-acquainted with the anatomy of chickens'.

of a fowl's anatomy and not their religious understanding of Islamic practice. He stated that the witnesses did not appear to know about the jugular vein which was adjacent to the carotid arteries. Yet, he added that it would be impossible to cut the carotid arteries without the jugular vein as well. The cutting of both the carotid arteries and the jugular vein would cause unconsciousness usually in about ten seconds followed by death in a minute or two. If the bird took ten minutes to die, it meant that the carotid artery and jugular vein had not been severed. This in turn, meant that the bird had not been killed in accordance with 'Mohamedan law', he concluded, as the bird had clearly suffered unnecessarily. He conceded that death could ensue beyond two minutes, even up to three minutes, but that even this was not likely (*Straits Times*, 1930f)

Thus, without directly addressing Naina Mohamed's specific actions that fateful July morning, the three experts had managed to suggest in court that Naina Mohamed could not have carried out animal slaughter according to proper prescribed Islamic method simply because the fowl took too long a time to die. At the same time, British legal authorities had the opportunity to demonstrate that they were not so conceited as to judge the correctness of Islamic practices in a British colonial court. Having proven that Naina Mohamed did not in fact practise the proper Islamic method in his attempt to slaughter the chicken that day, the Court of Appeals established that Naina Mohamed was indeed at fault and deserved the sentence that was meted out earlier by the magistrate. After all, all parties agreed that he had caused an animal to suffer, even if unwittingly, and that his actions went against the humane spirit of Islamic law confirmed by the religious experts.

The guilty conviction of Naina Mohamed in the Court of Appeals caused great anxiety amongst Muslims in Penang who thought that British judges should not rule out the Islamic method of slaughter as illegal (*Straits Times*, 1930 g). Mr A.L. Birse, Chairman of the Mohamedan Advisory Board of Penang in 1930 reassured Muslims that Judge Sproule who heard the appeal found that the fowl in question was not slaughtered properly according to Islamic rites which resulted in unnecessary suffering. The judge was, in other words, not criticising Islamic practice in this matter, as he had carefully ascertained that Naina Mohamed had not conformed to the prescribed Islamic method of slaughter since the chicken did not die immediately. Thus, to find the accused guilty in court was not to render Islamic method of slaughter illegal. It only meant that the court found his particular act cruel to animals. Through their legal reasoning in the trial of an errant butcher, the British court essentially upheld Islamic law by determining proper Islamic practice in the slaughter of animals which necessitated a quick death.

Alternative slaughter methods

Yet, halal slaughter methods remained under siege in the public press. On the day of Naina Mohamed's guilty verdict in the Court of Appeals, the author of an unsigned editorial column published in the *Straits Times* expressed hope that due to the case of Naina Mohamed, Muslims would perhaps be open to change their present method of slaughter to include electrical stunning as a viable method of slaughter, especially as 'the movement for humane slaughtering spreads throughout the civilized world' (*Straits Times*, 1930h). Electrical stunning was considered more humane by its proponents since the

animal was less likely to struggle and therefore feel less pain at the moment of slaughter. During the colonial period, Muslim subjects were reluctant to accept the method of electrical stunning since there was a high risk of the animal dying before the moment of animal slaughter.²¹ Indeed, during the colonial period, stunning was exclusively done to cause a cardiac arrest in the animal leading to its immediate expiration. The slaughter of a dead animal, i.e. carrion, renders the meat haram or forbidden in Islamic law.²² Hence, this method was unacceptable.

By alluding to the humaneness of electrical stunning, the editorial had reframed the issue of animal slaughter as something that was decidedly no longer primarily religious. Rather, the issue was cast as a matter of animal welfare. By yoking the issue to a scale of civilisation, the editorial, not surprisingly, led to a backlash from the Muslim community who defended their practices by arguing that their method of slaughter was indeed humane and mindful of animal welfare, and therefore, civilised. However, the writer of the article advocating stunning was quick to emphasise that the British administration would not attempt to override religious beliefs. He admitted that Naina Mohamed's ineffective slaughtering was not in accordance with Islamic law, and that if it had been effective, unconsciousness would supervene in about 10 seconds and reduce the animal's pain to a minimum. He expressed confidence that Muslims themselves would be among the first to demand efficient slaughtering by poulterers in this country, further reiterating that the onus to change would be on the Muslim community and not the British Government. Despite his reassurance, the damage was done. His condescending parochial tone was not appreciated by a *Straits Times* reader who wrote a letter to the editor three days later.

Under the pseudonym 'Worshipper' (*Straits Times*, 1930i), the writer emphasised that in Islam, 'the religion of humanity', all domestic animals should be slaughtered. Worshipper repeated the anatomical details of slaughter provided by Sheik Abdulla Maghribi, but unlike the latter, he astutely cited a different legal textbook from the religious teacher, a text which was not only recognised by English courts but one that had been translated by a member of the English legal profession in the British Settlement of Singapore.²³ This suggests that he was knowledgeable about legal workings of British

²¹Pre-slaughter electrical stunning is quite common in slaughterhouses today and does not necessarily render the meat haram as long as the animal does not accidentally die. The most important factor determining the rate of accidents is the electrical voltage which can be easily controlled. For more, see Riaz and Chaudry (2003: 61). For a contemporary example of precautions taken with respect to electrical stunning in Southeast Asia, see Majlis Ugama Islam Singapore's 'Guidelines to Islamic slaughtering' <<http://www.muis.gov.sg/cms/services/hal.aspx?id=1708>>

²²The Qur'an (line 16: 115) states: 'He (God) has forbidden you only these things: carrion, blood, pig's meat, and animals over which any name other than God's has been invoked. But if anyone is forced by hunger, not desiring it nor exceeding their immediate need, God is forgiving and merciful.'

²³Nawawī (1914: 472–3) and the relevant section is 'Book 59 – On hunting and slaughter of animals', where it states that to slaughter an animal by cutting the nape of the neck is forbidden; and the flesh of an animal so killed can only be eaten if the butcher perceives his error and cuts at once the larynx and the oesophagus before the animal ceases to live. In response to the *Straits Times* editorial, 'Worshipper' stressed that the flesh of animals otherwise slaughtered was forbidden to Muslims.

courts with regards to religious affairs. Thus began a rancorous exchange between Muslim subjects and British authorities in the *Straits Times*.

Animal welfare (SPCA)

The case of Naina Mohamed garnered much attention partly because it occurred at a time when the animal welfare movement was at its peak. Since the early 20th century, the animal welfare movement was gaining momentum throughout the British empire, bound up with notions of race and graded civilisation.²⁴ The case of Naina Mohamed was brought to court amidst rising concerns about animal welfare in slaughterhouses in Singapore that intensified in the mid 1920s. An editorial in the *Straits Times* on 27 October 1926 revealed that there had been a recent revival of interest in the subject of the treatment of animals in Singapore that resulted in a request from the Straits Settlements Association of the Prevention of Cruelty to Animals (PCA) to the Straits Settlements Government to appoint a commission of inquiry into alleged cruelty in the treatment of animals up for slaughter (*Straits Times*, 1926a). The Association suggested that the Government inspect for themselves conditions in certain ships in the port, the loading and discharging of live cargo in the harbour, and the crating of poultry for rail transport.

The PCA was a strong proponent of electrical stunning as a slaughter method and was very critical of other methods. Due to the large Muslim clientele amongst meat consumers in the Straits Settlements and the rest of Malaya, nearly all animals were slaughtered in the halal way in the Straits Settlements before being exported to the peninsula. Only pigs were killed by electrical stunning in the colony but not all other cattle. The PCA cast serious doubt on veterinary surgeons' opinion that the severing of blood vessels produced instant unconsciousness as Muslims believed. They claimed that the traditional method probably produced considerable suffering, and it was 'revolting' to anyone accustomed to the European method of stunning before slaughter. Nonetheless, the PCA representative was quick to advocate a policy of non-interference with this 'traditional Mohamedan practice' not dissimilar to the toleration of the Jewish kosher method of slaughter in England.²⁵

Though at odds with each other, both Muslim colonial subjects and colonial authorities contributed to the ethical turn with regards to the issue of animal slaughter.²⁶ No longer was the animal slaughter simply the purview of economic considerations or public hygiene. From the late 1920s onwards, animal welfare, a common interest to both communities, took centre stage. The chicken that took a long time to die on that fateful July morning

²⁴For the history of the SPCA in colonial Kenya in the 1920s and 1930s where whites acting under the aegis of the East African Society for the Prevention of Cruelty to Animals added education to their strategies of inculcating among Africans the need for kindness, see Shadle (2012: 1097–116).

²⁵The PCA writer then moved on to criticise the unsuitable method of transportation of animals by sea as the crating of animals for road, rail and sea were filthy and distressing for the animals, and 'frequently deplorable'. This criticism was not meant solely for Muslims for he alluded to the transportation of pigs as well.

²⁶'Ethics' was not simply a set of doctrines; it had to be considered as a complex set of relays between moral contents, aesthetic-affective styles, and public moods (Bennett 2010: xii).

in 1929 more than provided the context for public debate. The spectre of the ailing fluttering chicken on the ground ignited debates that focused on actual practice of ethical animal slaughter. During the trial of Naina Mohamed, all parties involved chose to speak for the chicken instead of focusing on the more prosaic matters of cost-cutting and public hygiene. Since the charge against Naina Mohamed was of animal cruelty, the trial itself and the trial coverage focused more on animal pain and suffering caused by slaughter method. Captain Edward Pratt's testimony spoke only of the poor chicken's pain. The PCA branch in the British Straits Settlements also stepped in, campaigning more intensely in the wake of the trial. Judge Sproule who presided over the case of Naina Mohamed in 1929 also spoke of the chicken involved and not the knife or the importance of proper facilities in the marketplace.

A week later on 4 November 1926, a reader by the name of 'Islamica' wrote to the editor of the *Straits Times* (1926b) in response to the article of 27 October last on the PCA (*Straits Times* 1926a). The writer pointed out that meat from animal slaughter by Muslims was popular because consumers were assured of freshness since the cattle had only been recently killed. Secondly, the writer argued that stunning animals before killing them was actually tantamount to making them ill. Electrical stunning made animals giddy, he claimed. As a result, no Muslim would eat the meat of an animal slaughtered in this way. He also stated that the current method of transportation of cattle was not cruel as the cattle's health was well looked after by importers who themselves benefitted from consuming these healthy animals anyway. In Singapore, these animals were housed in well ventilated sheds, and were inspected by the Government Veterinary authorities daily. He ended by emphasising that the method of slaughter had been in practice for thousands of years, and the talk of change should not be done at random. He barely hid his contempt for colonial arrogance when he wrote:

The question of the method of slaughtering cattle for human consumption is an academical one, and any attempt to effect a change in the method out of respect to the tender feelings of a few Europeans, who are largely cold-storage meat-eaters, is neither desirable nor necessary.

(*Straits Times*, 1926b)

A short editorial note immediately below the published letter assured readers that no change to the traditional practice of the Muslim community was being planned. However, it stressed that electrical stunning remained a preferable method in the hot climate in the tropics, and that stunning actually prevented the infliction of suffering. This finding, the editorial claimed, was based on prolonged research and experiment by the Royal Society for the Prevention of Cruelty Towards Animals (RSPCA) in Great Britain.

There was a stark absence of honest and open discussions conducted in the public sphere, despite the existence of obvious discontentment with the Islamic method of slaughter.²⁷ It would seem that debates in the colony often occurred in the newspapers amongst individuals who hid behind pseudonyms, as in the case of 'Worshipper' and 'Islamica', or unidentified journalists who spoke for colonial authorities and the PCA.

²⁷On British views of local public opinion amongst subject populations in a colonial setting, see Haynes (1991: 97–107).

This lack of openness in newspaper forums created a real barrier for candid and respectful discussions which should hold discussants accountable for their views and opinions. Rather than producing a forum for dialogue, letters and articles appear as scathing criticisms of preceding opinions.

Role of Cold Storage

Animal welfare was not the only major factor in the debates surrounding halal slaughter. One constant source of grievance for British municipal authorities was the public slaughterhouses' state of hygiene. The high price of beef and mutton due to the high cost of transportation of live animals was also a major problem. Some British authorities believed that this problem would be solved by importing frozen meat. Rather fortuitously, the Cold Storage Company which had its retail outlet in Singapore was also pushing its own commercial agenda after being successful in exporting meat to Hong Kong in 1901. They first attempted to establish a branch in Singapore in a bid to export frozen meat to Europeans based in the Straits Settlements who were already fans of the high quality frozen meat produced by the company which was in constant supply due to lack of patrons amongst local populations (*Straits Times*, 1902). British authorities in Singapore even sent four Muslim butchers (one Indian and three Malays) to Queensland, Australia, to slaughter cattle in 1905.²⁸ In 1923, more Muslim butchers were sent to Brisbane after meat traders discovered that Muslim consumers in the Malay States and the Straits Settlements tended to only acquire meat slaughtered by Muslim butchers (*Straits Times*, 1923a). However, Australian and British meat-traders soon discovered that this practice was not very effective since frozen and defrosted meat was considered 'dead meat' by Muslims who would not consume it.²⁹ Although importation of frozen meat was considered more sanitary and practical, importation on the hoof was still regarded as the most satisfactory way to supply beef and mutton to as many people as possible in the Malay States and the Straits Settlements.³⁰

Ineffectiveness of Mohamedan Advisory Board

What accounted for the lack of open public discussion regarding critical issues pertaining to religious practice? The absence of a viable forum for debate was most probably due to the absence of well defined institutions of delegated legal authority that could have

²⁸The politicians were severely chastised by the writer of a *Straits Times* (1905) article who dismissed them as 'rabid demagogues of a normally uneducated and unintelligent class'.

²⁹The Eastern and Australian Meat Company made further inroads into importation of halal (permissible) frozen meat from Australia which bore 'Mohamedan certificates' (*Straits Times*, 1914a, 1914b, 1924).

³⁰Nonetheless, in the Federated Malay States and the Straits Settlements, the British authorities would continue to strive to import as much frozen meat as possible in order to bring the price of mutton down. Australian sheep was considered superior to sheep from other places such as India by British residents in the Straits Settlements. The European community in the Malay States and the Straits Settlements were the main beneficiaries of frozen meat from Australia (*Rambles in Java*, 1853: 17; *Straits Times*, 1922, 1923a, 1923b).

voiced the concerns of the Muslim community coherently in a timely fashion. The Mohamedan Advisory Board, established in 1915, proved inadequate as mediators of disputes. Styled as an organisation of ad hoc consultants, rather than as an authoritative body, the Board often functioned as an extension of colonial authority rather than a religious authority that provided crucial feedback from the community they supposedly represented. Without any adjudicative authority, the Board could not provide a forum to judge proper halal slaughter. Hence, none of the debates on animal welfare that emerged in England in the 19th century amongst various factions were discernible in the colony.

Instead, lone angry voices emerged in the public press. 'Worshipper' highlighted the Mohamedan Advisory Board's indifference and passivity in the case of Naina Mohamed. He asked 'Is it not the duty of the Mohamedan Advisory Board to see that all important religious cases should be tried in Courts with learned Muslim assessors in the Bench?' (*Straits Times*, 1930j). Indeed, the Board's reluctance to voice their opinions on the issue during and after the trial indicated their deference to colonial authority which was the basis of their own authority in the colonies. Thus, unsurprisingly, 'Worshipper' quickly shifted the focus of his criticism to colonial authorities. Adopting a sharp and exacting tone in his letter, he emphasised that:

Slaughtering in Islam, is not a matter of opinion but one of the roots of the religion. No believer in the Quran would dare to alter a word, not a law in that Holy Scripture. It should be remembered that the Holy Quran is a book sent by God, and not made by man, as some other scriptures are made.

(*Straits Times*, 1930j)

'Worshipper' cited the Qur'an (line 5:4) which he claimed was 'very clear on the point'.³¹ He seemed convinced that Naina Mohamed followed the proper Islamic procedure, or at least aspired to, for he took it upon himself to witness 'a highly religious gentleman' slaughter two Siamese fowls which took four minutes to die although it was well known that Siamese fowls were very strong and took a little more time to die than other fowls.

Two months later, on 12 April 1930, an article in the *Straits Times* (1930k) addressed the issue of animal slaughter. The writer stressed that reform in Islamic practice of animal slaughter could only be initiated by Muslims themselves, while acknowledging that electrical stunning or shooting of cattle was not allowed in Islam, and that Muslims were forbidden to eat the flesh of animals which were not living when their throats were cut. However, in contrast to the avid citation of the Qur'an and textbook of Islamic jurisprudence by 'Worshipper', the writer of the editorial piece chose anything but Islamic sources. He cited not the Qur'an, but the Talmud, and claimed that the original object in this matter was 'undoubtedly' one of hygiene. He then alluded to a commission in Sweden which had barred the Jewish kosher method of slaughter, deemed cruel because although unconsciousness set in swiftly after throat-

³¹The Qur'an (line 5: 4) states: 'They ask you, [O Muhammad], what has been made lawful for them. Say, Lawful for you are [all] good foods and [game caught by] what you have trained of hunting animals which you train as Allah has taught you. So eat of what they catch for you, and mention the name of Allah upon it, and fear Allah. Indeed, Allah is swift in account.'

cutting, consciousness also returned swiftly. Thus the commission ordered that the animal had to be shot after being cut with a knife. He ended on a patronising note that ‘our Mohammedan friends in the Colony will certainly wish to wait for guidance from high quarters before they consent to a change in their traditional rites’, but he was certain that change was ‘imminent’. In direct contrast to ‘Worshipper’, he stated that he believed that change will come from the will of the people, and not permanently fixed by divine word.

The ‘Worshipper’'s response was swift and fervent. He reiterated his point that slaughtering in Islam is not a matter of opinion but one of the roots, and that no word or law in the Qur’an may ever be altered (*Straits Times*, 1930). He quoted the Qur’an (line 5:3) thus firmly grounding his basis of authority in the matter in scripture yet again.³² He stressed that Muslim authorities will not consider changing Islamic rites concerning slaughter, and vouched for this from his own personal knowledge, blaming the editor’s remarks on his ‘imagination’. ‘Worshipper’'s response closed the debate on animal slaughter during the colonial period until after World War II when the issue of animal stunning was raised again.

Conclusion

Although the case of Naina Mohamed in 1929 managed to attract the attention of wide sections of society and spark intense debates, the tone on both sides became too defensive to lead to fruitful consensus. Both Muslim subjects and the British colonial elite spoke at tangents to each other through their main medium, the colonial newspaper, the *Straits Times*, each taking turns to agitate and soothe each other. Their fervour undermined the success of public dialogue. Instead of focusing on Naina Mohamed’s error, the debates in the public press turned on the notion of ‘halal slaughter’ especially after the court tried to determine whether Naina Mohamed had followed the proper guidelines.

Although issues deemed to be ‘religious’ such as family law were considered ‘private’ by the British colonial elite, such issues were still subject to colonial intervention. The case of Naina Mohamed demonstrates that the issue of religious slaughter of animals lie precariously between the private and public realms since they often occurred in public places such as markets, abattoirs and slaughterhouses. Colonial responsibility for public hygiene and maintenance of slaughter facilities provided the colonial government more reason and confidence to intervene in the issue. In addition, animal welfare

³²The Qur’an (line 5:3) states: ‘Prohibited to you are dead animals, blood, the flesh of swine, and that which has been dedicated to other than Allah, and (those animals) killed by strangling or by a violent blow or by a head-long fall or by the goring of horns, and those from which a wild animal has eaten, except what you [are able to] slaughter [before its death], and those which are sacrificed on stone altars, and (prohibited is) that you seek decision through divining arrows. That is grave disobedience. This day those who disbelieve have despaired of [defeating] your religion; so fear them not, but fear Me. This day I have perfected for you your religion and completed My favour upon you and have approved for you Islam as religion. But whoever is forced by severe hunger with no inclination to sin – then indeed, Allah is Forgiving and Merciful.’

groups from the mid 19th century to the first half of the 20th century felt compelled to speak for animals which they increasingly regarded as a protected entity.

Under colonial rule, the realm of religion, however ill defined, was one of the very few domains where colonial subjects retained a degree of autonomy. Hence, any sign of colonial encroachment was likely to be swiftly met with significant pushback as in the case of animal slaughter from 1929 till 1931. Muslim subjects were acutely aware that a system of juristic legal pluralism meant that there would be a high risk of colonial intervention in religious affairs. As a consultative body that was neither invested with official authority nor legislative power, the Mohamedan Advisory Board was unable to officially defend specific Islamic practices. Furthermore, since the representatives on the Mohamedan Advisory Board were appointed by colonial officials, they were beholden more to their employers than to fellow Muslim subjects. Their ineffectiveness undermined smooth dialogue between colonial subjects and the government, and limited conversations to the combative space of the courtroom and the public press dominated by the government. In these spaces, the direction of conversation was solely determined by the colonial government. The British general colonial policy of 'non-interference in religious affairs' constricted the flow of smooth dialogue on issues deemed religious. Ultimately, this policy prevented both British reform of Islamic legal practices, and fruitful interchange of ideas between British colonial elites and Muslim subjects.

References

- Acts and Ordinances of the Legislative Council of the Straits Settlements. From the 1st April 1867 to the 7th March 1898.* 1898. London: Eyre and Spottiswoode.
- Adcock, C.S. 2014. *The limits of tolerance: Indian secularism and the politics of religious freedom.* New York: Oxford University Press.
- Agrama, Hussein Ali. 2012. *Questioning secularism: Islam, sovereignty, and the rule of law in modern Egypt.* Chicago: University of Chicago Press.
- Anderson, J.N.D. 1968. Eclipse of the patriarchal family in contemporary Islamic law. In J.N.D. Anderson (ed.), *Family law in Asia and Africa.* London: George Allen and Unwin, pp. 221–34.
- Asad, Talal. 1997. On torture, or cruel, inhuman, and degrading treatment. In Arthur Kleinman, Veena Das, and Margaret Loc (eds), *Social suffering.* Berkeley CA: University of California Press, pp. 285–308.
- Asad, Talal. 2003. *Formations of the secular: Christianity, Islam, modernity.* Stanford CA: Stanford University Press.
- Bearman, P.J., Banquis, Th., Bosworth, C.E., van Donzel, E., Heinrichs, W.P. (eds). 2006. *Encyclopaedia of Islam.* 2nd edn. Leiden: Brill. <http://referenceworks.brillonline.com/entries/encyclopaedia-of-islam-2-Glossary-and-Index-of-Terms/h-ala-l-SIM_gi_01442> Accessed 20 August 2014.
- Bennett, Jane. 2012. *Vibrant matter: a political ecology of things.* Durham NC: Duke University Press.
- Benton, Lauren. 2002. *Law and colonial cultures: legal regimes in world history.* Cambridge: Cambridge University Press.
- Beverly, Eric Lewis. 2011. Property, authority and personal law of waqf in South Asia. *South Asia Research* 31 (2): 155–82.

- Birla, Ritu. 2009. *Stages of capital: law, culture and market governance in colonial India*. Durham NC: Duke University Press.
- Brown, Nathan J. 1997. *The rule of law in the Arab World, courts in Egypt and the Gulf*. Cambridge: Cambridge University Press.
- Cohn, Bernard S. 1996. *Colonialism and its forms of knowledge – the British in India*. New York: Princeton University Press.
- Cook, Michael. 1986. Early Islamic dietary law. *Jerusalem Studies in Arabic and Islam* 7: 217–77.
- Cook, Michael. 1984. Magian cheese: an archaic problem in Islamic law. *Bulletin of the School of Oriental and African Studies* 47: 449–67.
- Deguilhem, Randi. 1995. *Le waqf dans l'espace islamique: outil de pouvoir socio-politique*. Damascus: Institut Français d'Etudes Arabes de Damas.
- Deguilhem, Randi. 2004. *Les fondations pieuses (waqf) en Méditerranée: enjeux de société, enjeux de pouvoir*. Kuwait: Kuwait Awqaf Public Foundation.
- Dirks, Nicholas. 1993. *The hollow crown: the ethnohistory of an Indian kingdom*. Ann Arbor MI: University of Michigan Press.
- Doumani, Beshara (ed.). 2003. *Family history in the Middle East: household, property and gender*. Albany NY: State University of New York Press.
- Emerson, R. 1937. *Malaysia. A study in direct and indirect rule*. New York: Macmillan.
- Ferguson, Moira. 1998. *Animal advocacy and Englishwomen, 1780–1900: patriots, nation, and empire*. Ann Arbor MI: University of Michigan Press.
- Freidenreich, David M. 2011. *Foreigners and their food: constructing otherness in Jewish, Christian, and Islamic law*. Berkeley CA: University of California Press.
- Haynes, Douglas. 1991. *Rhetoric and ritual in colonial India: the shaping of a public culture in Surat city, 1852–1928*. Berkeley CA: University of California Press.
- Kean, Hilda. 1998. *Animal rights: political and social change in Britain since 1800*. London: Reaktion Books.
- Keith, A.B. 1922. *Speeches and documents on Indian policy 1750–1921*. Vol. 1. London: Oxford University Press.
- Kolsky, Elizabeth. 2010. *Colonial justice in British India – white violence and the rule of law*. Cambridge: Cambridge University Press.
- Kozlowski, Gregory. 1985. *Muslim endowments and society in British India*. New York: Cambridge University Press.
- Kugle, Scott Alan. 2001. Framed, blamed and renamed: the recasting of Islamic jurisprudence in colonial South Asia. *Modern Asian Studies* 35 (2): 257–313.
- Laws of the Straits Settlements*. 1920. Vol. 2 London: Waterlow and Sons.
- Malayan Saturday Morning Post*. 1924. The situation in India, 30 August, p. 16.
- Merry, Sally E. 1988. Legal pluralism. *Law and Society Review* 22 (5): 869–961.
- Moors, Annelies. 1999. Debating Islamic family law. In Margaret L. Meriwether and Judith E. Tucker (eds), *Social history of women and gender in the modern Middle East*. Boulder CO: Westview Press, pp. 141–77.
- Nawawī, Muḥyi al-Dīn Abu Zakarīyā Yaḥyā Ibn Sharaf ibn. 1914. *Minhaj Et Talibin*. A manual of Muhammadan law according to the school of Shafii. Translated by E.C. Howard from the French edn of L.W.C. van den Berg. London: W. Thacker & Co.
- Rambles in Java and the Straits in 1852*. 1853. London: Simpkin, Marshall and Co.
- Riaz, Mian N. and Chaudry, Muhammad M. 2003. *Halal food production*. Boca Raton FL: CRC Press.

- Ritvo, Harriet. 1987. *The animal estate: the English and other creatures in the Victorian age*. Cambridge MA: Harvard University Press.
- Shadle, Brett. 2012. Cruelty and empathy, animals and race, in colonial Kenya. *Journal of Social History* 45 (4): 1097–116.
- Sharafi, Mitra. 2014. *Law and identity in colonial South Asia – Parsi legal culture, 1772–1947*. New York: Cambridge University Press.
- Straits Times*. 1902. The Queensland drought broken, 9 October, p. 4.
- Straits Times*. 1905. Editorial, 24 February, p.4.
- Straits Times*. 1914a. Veterinary work in F.M.S. 16 February, p. 10.
- Straits Times*. 1914b. A deal in mutton – claim for supply of Australian sheep, 11 November, p. 7.
- Straits Times*. 1922. Cold Storage – Colonel H.L. Pearson’s report, 1 August, p. 10.
- Straits Times*. 1923a. Cold Storage, 6 April, p. 2.
- Straits Times*. 1923b. Australian trade – views of Eastern Trade Commissioner, 5 November, p. 11.
- Straits Times*. 1923c. Government trading, 25 November, p. 8.
- Straits Times*. 1924. Eastern meat industry, 28 June, p.11.
- Straits Times*. 1925. Letter to the Editor from F.W. Douglas, 24 October, p. 10.
- Straits Times*. 1926a. P.C.A. in Singapore, 27 October, p. 8.
- Straits Times*. 1926b. P.C.A. in Singapore – letter from ‘Islamica’ to the Editor, 4 November, p. 10.
- Straits Times*. 1930a. Mohamedans anxious – perturbed over fowl cruelty case, 18 January, p. 12.
- Straits Times*. 1930b. Malayan Moslems and a slaughter method – perturbation created by prosecution, 30 January, p. 6.
- Straits Times*. 1930c. Merely wounded: District Officer’s discovery in the market, 30 January, p. 6.
- Straits Times*. 1930d. Magistrate’s reasons – unnecessary to cut throat ineffectively, 30 January, p. 6.
- Straits Times*. 1930e. Expert evidence, 30 January, p. 6.
- Straits Times*. 1930f. Fowl has a soul. 30 January, p. 6.
- Straits Times*. 1930g. Doctor called – jugular vein overlooked by witnesses, 30 January, p. 6.
- Straits Times*. 1930h. Notes of the day – ten minutes to die, 30 January, p. 6.
- Straits Times*. 1930i. Letter to the Editor from ‘Worshipper’: ten minutes to die, 4 February, p. 19.
- Straits Times*. 1930j. Letter to the Editor from ‘Worshipper’: killing pigs humanely, 18 February 1930, p. 19.
- Straits Times*. 1930k. Abattoir reform, 12 April, p. 10.
- Straits Times*. 1930l. Letter to Editor from ‘Worshipper’ – Abattoir reform, 15 April, p. 19.
- Straits Times Weekly Issue*. 1893. The Bombay riots, 22 August, p. 2.
- Sturman, Rachel. 2012. *The government of social life in colonial India – liberalism, religious law, and women’s rights*. New York: Cambridge University Press.
- Sullivan, Winnifred F. 2005. *The impossibility of religious freedom*. Princeton NJ: Princeton University Press.
- Sullivan, Winnifred Fallers, Yelle, Robert A. and Taussig-Rubbo, Mateo (eds). 2011. *After secular law*. Stanford CA: Stanford University Press.
- Turner, James. 1980. *Reckoning with the beast: animals, pain, and humanity in the Victorian mind*. Baltimore MD: Johns Hopkins University.

- Veer, Peter van der. 1994. *Religious nationalism: Hindus and Muslims in India*. Berkeley CA: University of California Press.
- Wheeler, Brannon M. 2013. Animals, in law. In Kate Fleet et al. (eds), *Encyclopaedia of Islam*. 3rd edn. Leiden: Brill. <http://referenceworks.brillonline.com/entries/encyclopaedia-of-islam-3/animals-in-law-COM_0169> 20 August 2014.
- Yang, Anand A. 1980. Sacred symbol and sacred space in rural India: community mobilization in the 'anti-cow killing' riot of 1893. *Comparative Studies in Society and History* 22 (4): 576–96.
- Website*
 Majlis Ugama Islam Singapore. *Guidelines to Islamic slaughtering*. <<http://www.muis.gov.sg/cms/services/hal.aspx?id=1708>> Accessed 30 August 2014.

Author biography

Nurfadzilah Yahaya is the Mark Steinberg Weil Early Career Fellow in Islamic Studies at Washington University in St Louis, USA. Email: fadzilah.yahaya@gmail.com