

**Department for Environment, Food and Rural Affairs**

# **Mandatory Closed Circuit Television (CCTV) recording in slaughterhouses – a consultation**

**August 2017**

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# Part 1 - – Introduction

## Purpose of this consultation

1. The purpose of this consultation is to seek views on a proposal for mandatory CCTV recording in slaughterhouses for animal welfare purposes.
2. The objective of the proposal is to improve animal welfare in all slaughterhouses and provide assurance that there is effective monitoring and verification of animal welfare standards in all slaughterhouses.

## Scope

3. The Government has a manifesto commitment to make CCTV recording in slaughterhouses mandatory. The proposal for reform outlined in this consultation relates to the mandatory installation and operation of CCTV equipment in all areas of approved slaughterhouses where live animals are present, e.g. where they are unloaded, kept, handled, stunned and killed; and for authorised officers, e.g. Official Veterinarians of the Food Standards Agency, to have unfettered access to these facilities for the purpose of monitoring and verifying of animal welfare standards in the slaughterhouse.
4. The proposal outlined in this consultation relates solely to England as animal welfare policy is devolved.

## Audience

5. Anyone may respond to the consultation. Defra would particularly like to hear from organisations and individuals involved in and concerned with the slaughter of animals. Campaigns resulting in stock responses will be recorded but may not be individually acknowledged.

Those who have an interest include:

Trade representatives in the livestock and meat industries  
Animal welfare organisations  
Animal welfare enforcement bodies  
The veterinary profession  
The Farm Animal Welfare Committee  
Farm assurance schemes  
Retailers

## Responding to the consultation

6. This consultation started on 11 August 2017 and closes on 21 September 2017. We would prefer you to respond to the consultation questions using the online survey which can be found on Citizen Space at <https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses>. However, responses can be sent to the Animal Welfare Team by email or post.

**Q1 Your name.**

**Q2 Your e-mail address.**

**Q3 Your organisation.**

Enquiries and responses should be directed to:

E-mail: [animalwelfare.consultations@defra.gsi.gov.uk](mailto:animalwelfare.consultations@defra.gsi.gov.uk)

or

The Animal Welfare Team  
Area 5B, Nobel House  
17 Smith Square  
London SW1P 3JR

If you would like to receive hard copies of the consultation documents, you may contact the Animal Welfare Team at the above email address.

## After the consultation

7. Members of the public may ask for a copy of the responses under Freedom of Information legislation. If you do not want your response - including your name, contact details and any other personal information - to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer that will not count as a confidentiality request. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under Freedom of Information legislation. However, because of the law, we cannot promise that we will always be able to keep those details confidential.

8. We will summarise all responses and place this summary on our website at: <https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses>.

9. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

10. This consultation is in line with the Government's Consultation Principles. **Please note that a consultation period of 6 weeks applies.** More information on the Government's Consultation Principles can be found at:

<https://www.gov.uk/government/publications/consultation-principles-guidance>.

## Part 2 – Consultation

### Background

11. There are strict rules for the protection of animals at slaughter contained in EU and domestic legislation.

12. Council Regulation 1099/2009, on the protection of animals at the time of killing, applies to all animals bred and kept for the production of food, as well as other products. In England, the Welfare of Animals at Time of Killing Regulations 2015 provides the powers to enforce the EU regulation fully and retains our longstanding stricter national rules which give greater protection than the EU regulation<sup>1</sup>.

13. Legislation is aimed specifically at preventing cruelty or poor practice in slaughterhouses or other places where animals are slaughtered or may have to be killed. Regulations set down specific requirements which must be complied with at all stages of the slaughter or killing process. The regulations make it an offence to cause any animal avoidable pain, distress or suffering.

14. Food Business Operators are primarily responsible for the welfare of animals in their premises. Official Veterinarians of the Food Standards Agency monitor and enforce the welfare regulations in all approved slaughterhouses to ensure that animals are spared avoidable pain, distress or suffering during the slaughter process. The Food Standards Agency approves slaughterhouses in line with EU Regulations (EC) No. 852/2004 and 853/2004.

15. Our proposal would introduce mandatory CCTV recording in all slaughterhouses as an additional enforcement measure under the Animal Welfare Act 2006, in line with the Government's manifesto commitment to make CCTV recording in slaughterhouses mandatory.

16. The Farm Animal Welfare Committee (FAWC) was commissioned by GB Governments to produce an independent assessment of the benefits of CCTV in slaughterhouses. The report was published in February 2015:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/400796/Opinion\\_on\\_CCTV\\_in\\_slaughterhouses.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/400796/Opinion_on_CCTV_in_slaughterhouses.pdf)

17. CCTV was identified as offering real benefits in slaughterhouses as an important complement to official physical observation and verification of slaughterhouse practices and effectively recording animal welfare abuses. FAWC recommended that all approved slaughterhouse operators should install CCTV in all areas where live animals are kept and where animals are stunned and killed. FAWC also recommended that CCTV cameras should be installed so as to permit a clear and uninterrupted view of the processes being recorded at all times; that CCTV footage should be accessible to and viewed on a regular basis by Food Business Operator staff, Animal Welfare Officers and Official Veterinarians to ensure business compliance, particularly in those areas and for those processes where the risk of non-

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<sup>1</sup> In June 2016, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period the Government will continue to negotiate, implement and apply EU legislation. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation in future once the UK has left the EU.

compliance is higher; and that CCTV footage should be retained by the slaughterhouse for a period of three months and be available to authorised officers.

18. FAWC stated that CCTV should not replace, reduce or be considered a substitute for current controls of slaughterhouse practice undertaken by Official Veterinarians, Animal Welfare Officers, slaughter operators and others. FAWC recognised its additive value towards protecting animal welfare and benefiting the plant operator's business.

19. FAWC identified many benefits of CCTV to the Food Business Operator which include:

- providing evidence of due diligence and compliance with legislative and commercial standards and responsiveness to consumer concerns increasing public trust;
- contributing to Food Business Operator reviews of effectiveness of operations (including improving handling and reducing stress in animals) and enable the Food Business Operator to make improvements to processes and operating instructions;
- providing a valuable training tool for slaughterhouse staff;
- encouraging collective responsibility in slaughterhouse staff;
- providing evidence for disciplinary action; and
- enabling disputes to be resolved including relating to spurious allegations.

20. Following publication of the FAWC report, two industry bodies – the British Meat Processors Association and the Association of Independent Meat Suppliers – published a protocol for the industry on the use of CCTV in slaughterhouses (November 2015). This drew heavily on FAWC's recommendations.

21. Some recent cases of animal abuse at slaughterhouses have been brought to light through covert filming made available to the Food Standards Agency by animal welfare NGOs. These cases have increased the calls from animal welfare NGOs (e.g. RSPCA, Compassion in World Farming, World Horse Welfare) and veterinary organisations (e.g. British Veterinary Association) for mandatory CCTV in slaughterhouses for animal welfare purposes. There have also been calls for unfettered access for Official Veterinarians to CCTV footage where CCTV is installed. In May 2017 FSA agreed a protocol with industry on limited access to live CCTV feeds.

22. Recently there has been a Parliamentary debate on CCTV in equine slaughterhouses. In January 2017 the French Assembly voted for the compulsory installation of CCTV in all slaughterhouses - if approved by the senate this will come into force in January 2018. This follows exposes of animal welfare abuses in French slaughterhouses.

## Issue being addressed

23. CCTV has been identified as offering real benefits as an important complement to physical observation and verification of slaughterhouse practices (FAWC report 2015).

24. In 2012 the Government consulted on introducing mandatory CCTV in slaughterhouses as part of its consultation on the Welfare of Animals at the Time of Killing Regulations and decided to maintain a voluntary approach for the time being. From 2011 to 2013 there was an increase in CCTV uptake but from 2013 until now there has been little further uptake. In 2013 around 43% of red meat slaughterhouses and around 55% of poultry slaughterhouses had CCTV installed for animal welfare purposes. In 2015 this had risen to around 49% of red meat slaughterhouses and to around 71% of poultry slaughterhouses.

25. Voluntary uptake of CCTV is by no means universal nor comprehensive in providing for monitoring and verification of compliance with animal welfare requirements. While voluntary uptake of CCTV in slaughterhouses has increased with the majority of animal throughput covered, the increase in CCTV uptake has stalled with only around 50% of red meat slaughterhouses and around 70% of poultry slaughterhouses having adopted CCTV for animal welfare purposes by 2016. (The latest survey of CCTV in slaughterhouses in England and Wales was conducted in 2016 by the Food Standards Agency: <https://www.food.gov.uk/news-updates/news/2016/15460/results-of-cctv-survey-in-slaughterhouses-published>).

26. While the majority of animals are slaughtered in plants that have, to some extent, installed CCTV for animal welfare purposes, there are still significant numbers that have no such protection. Given the large numbers of animals killed per year, 1% of poultry killed in the UK in plants without CCTV still equates to around 9 million birds. The same applies to other species: 8% of cattle equates to around 200,000 cattle; 4% of pigs equates to around 400,000 pigs; and 12% of sheep equates to more than 1.5 million sheep that are killed in premises without CCTV (Food Standards Agency CCTV Survey 2016).

27. Wherever live animals are kept in slaughterhouses animal welfare could be compromised. Slaughterhouses that have installed CCTV have not done so in a comprehensive manner. In 2016 the percentage of slaughterhouses with CCTV in particular locations were: unloading 46%; lairage 43%; race and restraint 37%; stun area 37%; and bleed area 38% (Food Standards Agency CCTV Survey 2016). This means that even in slaughterhouses where CCTV is installed key areas of welfare risk are not currently covered by cameras.

28. Official Veterinarians can currently seize CCTV footage if they suspect a breach of the regulations. Unfettered access for authorised officers, such as Official Veterinarians, at all times would provide more opportunities to assess compliance with the regulations on a proactive and reactive basis. Almost one fifth (around 18%) of abattoirs with CCTV have also said they would not allow unfettered access to CCTV footage for Official Veterinarians of the Food Standards Agency.

29. CCTV can enable official observation and verification of animal welfare incidents, and can contribute to the auditing of animal welfare and the verification of slaughterhouse compliance with legislation. CCTV offers authenticity and transparency and can be retained for future review or for evidential purposes.

30. CCTV can also enable the Food Business Operator or Official Veterinarian access to monitor activity in hard-to-see areas such as the stunning area or within gas stunning systems.

31. There have been problems with compliance and enforcement where Official Veterinarians of the Food Standards Agency are not present at the time and place when offences have taken place. The Official Veterinarian is responsible for monitoring the Food Business Operator's compliance with animal welfare and meat hygiene requirements and cannot be present at all parts of the process at all times.

## Proposal

32. The policy objective is to maintain and improve animal welfare standards in all approved slaughterhouses and provide assurance that this is the case. A related objective is to ensure that Food Standards Agency Official Veterinarians operate as effectively and as

efficiently as possible, by providing them in the best way with the information they need to do their jobs.

33. Mandatory CCTV recording should improve the efficiency of monitoring and enforcement activity, by providing Official Veterinarians with the information they need more readily and more conveniently – mandatory CCTV recording addresses an information asymmetry which exists between the regulator and the regulated. As a result of enhanced Official Veterinarian capability and of any behavioural change on the part of slaughterhouses, mandatory CCTV recording should lead to improved compliance by the sector, which may support improved public confidence and improved consumer confidence that welfare standards are being delivered. Slaughterhouses create negative impacts on other slaughterhouses when they abuse animal welfare and when this generates wider adverse reputational costs applying to the whole sector including the compliant majority.

34. Enhanced enforcement would require CCTV cameras to be installed and recording in all approved slaughterhouses in areas where live animals are unloaded, kept, handled, stunned and killed. The footage would need to be stored for 90 days, in line with FAWC's recommendation.

35. It is proposed that access to view live and stored footage should be given for authorised officers. This would enable authorised officers to check samples of CCTV footage both in real time and retrospectively, which broadens their monitoring options. CCTV footage will also allow verification of alleged breaches of animal welfare rules and have evidential status.

**Q4. Should there be mandatory CCTV recording in all approved slaughterhouses in areas where live animals are present? Please give reasons for your response.**

**Q5. Is it reasonable to require Food Business Operators to retain CCTV footage for 90 days? Please give reasons for your response.**

**Q6. If you believe the 90 day retention period to be unreasonable what is a reasonable retention period for CCTV footage? Please give reasons for your response.**

**Q7. Should there be unfettered access to CCTV footage, both real time and stored, for authorised officers, e.g. Official Veterinarians of the Food Standards Agency? Please give reasons for your response.**

## Legal status

36. There is currently no domestic or European legislation that requires CCTV for monitoring or verification of animal welfare in slaughterhouses.

37. Mandatory CCTV recording in all slaughterhouses as an enforcement measure could be required through an affirmative statutory instrument under the Animal Welfare Act 2006. This would ensure the benefits of CCTV to official controls are available in all approved slaughterhouses and that all areas of significant welfare risk are covered. The Food Standards Agency monitors and enforces animal welfare regulations in slaughterhouses in line with a hierarchy of sanctions, ranging from verbal and written advice through to reporting offences for prosecution. Penalties under the proposed secondary legislation would be

proportionately applied by the Food Standards Agency and limited by the requirements of the Animal Welfare Act 2006.

38. The Food Standards Agency would make use of CCTV as part of their existing enforcement role in the slaughterhouse. The same level of Official Veterinarian resource would be involved as now but would sometimes be engaged in different activities.

## Cost of proposal

39. An internal Impact Assessment (IA) has been prepared to outline the possible costs and benefits of the proposed reforms and is being made available to view alongside this consultation at <https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses>. We estimate the total capital cost of new CCTV installation at around £650,000; based on a one-off cost of £2,500 for premises without CCTV and £500 per additional area without coverage in plants with CCTV at present. Over a ten year life span for the equipment and including ongoing costs we estimate a cost to industry of around £260,000 per year.

40. The IA has assessed the costs of installation and maintenance of CCTV systems as well as the cost of storage of CCTV footage. This assessment has been based on limited information on costs and we would welcome information on this.

**Q8. What are your views on the possible costs and benefits of these proposed reforms, as set out in the internal Impact Assessment? Please provide evidence to support your response.**

**Q9. Are there other potential economic benefits or costs not set out in the Impact Assessment? Please provide evidence to support your response.**

41. We are aware there are several large companies that run slaughterhouses in the red meat and poultry sectors but data from public records shows that between 50 and 75% of slaughterhouses are small or micro businesses. Many of these small businesses already have CCTV. However, Government needs to be proportionate and fully assess the impact on smaller businesses of requiring CCTV to be installed. As such we are seeking views on this as part of this consultation.

42. Smaller premises should be able to meet the proposed requirements with a less extensive CCTV system than larger premises, thus limiting costs. We recognise that the financial impact on small businesses may still be considered a burden, however, we do believe that exempting small businesses from the regulation would undermine the effectiveness of the policy objectives.

**Q10. Should CCTV be installed in all approved slaughterhouses, regardless of size? Please provide justification for your response.**

**Q11. What do you think Government could do to help small businesses comply? Please provide justification for your response.**



## Animal Welfare

43. The Government is committed to improved standards of animal welfare at slaughter.
44. Benefits of CCTV in slaughterhouses for animal welfare can be realised through voluntary or mandatory routes, however, the mandatory option will provide full coverage of live animal areas in all slaughterhouses protecting all animals.
45. One of the primary benefits of CCTV is considered to be improved compliance with animal welfare at slaughter requirements, resulting from the deterrent effect of CCTV combined with the enhanced ability of the Food Standards Agency to take enforcement action.
46. While there is limited evidence available on the deterrent effect specifically of CCTV in slaughterhouses there is evidence from other contexts (e.g. the use of speed cameras have been demonstrated to reduce speeding and CCTV to reduce theft of and from vehicles).
47. Animal welfare benefits can flow from the fact that CCTV can observe and record real-time slaughterhouse processes, record individual events and contribute information to the auditing of animal welfare. Detection of animal welfare breaches can result in: a) consequences that act as a deterrent to further poor practice; and/or b) feedback and continuous improvement to slaughterhouse practices. Recordings can also aid the verification of slaughterhouse compliance with legislative requirements. CCTV footage can have authenticity and transparency as evidence and can be retained for long periods. It can enable the Official Veterinarians to observe live animals in high welfare risk areas as well as those that are inaccessible or dangerous to people. Ante-mortem inspection via CCTV can detect unguarded behaviours that might be hidden from human observers, e.g. lameness in sheep.

**Q12. Have we identified the main potential animal welfare gains from CCTV in slaughterhouses? Please give any other potential animal welfare gains.**

## Annex 1 – Summary of consultation questions

**Q1 Your name.**

**Q2 Your e-mail address.**

**Q3 Your organisation.**

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**Q11. What do you think Government could do to help small businesses comply? Please provide justification for your response.**

**Q12. Have we identified the main potential animal welfare gains from CCTV in slaughterhouses? Please give any other potential animal welfare gains.**



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