

Response to Defra Consultation on Mandatory Closed Circuit Television (CCTV) Recording in Slaughterhouses

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Wildlife and Countryside Link (Link) brings together 46 environment and animal protection organisations to advocate for the conservation and protection of wildlife, countryside and the marine environment. Our members practice and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together we have the support of over eight million people in the UK and manage over 750,000 hectares of land.

This response is supported by the following Wildlife and Countryside Link members:

- Four Paws
- Humane Society International – UK
- IFAW
- RSPCA
- Sustainable Food Trust

Link is pleased to respond to this consultation to improve animal welfare through mandatory CCTV recording in slaughterhouses. This response provides an overarching view for this proposal and key principles for the implementation of CCTV.

Introduction

We support the measure to introduce mandatory CCTV recording in approved slaughterhouses in areas where live animals are present. The use of independently monitored CCTV will reduce the incidence of poor welfare, as supported by the Food Standards Agency¹.

Installing CCTV will help to alleviate public concern and consumer expectation of the welfare of farmed animals at slaughter², improving assurance and transparency of the process. Additionally, this measure follows the independent recommendation by the Farm Animal Welfare Committee in 2015; '*all approved slaughterhouse operators should install CCTV in all areas where live animals are kept and where animals are stunned and killed*'.³

Mandatory CCTV in slaughterhouses will also offer multiple benefits to a number of stakeholders, including:

- Improved monitoring and enforcement, leading to a reduction in malpractice and enhanced animal welfare
- A management tool for the training and monitoring of slaughterhouse staff, developing the effectiveness of, and helping to refine, slaughterhouse operations,
- Demonstration of good practice at all times, should allegations be made to the contrary (due diligence).

¹ <https://www.food.gov.uk/sites/default/files/cctv-survey-results-2016.pdf>

² <https://petition.parliament.uk/archived/petitions/64997>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/400796/Opinion_on_CCTV_in_slaughterhouses.pdf



Making CCTV Mandatory

To date, a voluntary approach to installing CCTV has been adopted by the Government. Whilst this voluntary uptake has increased over the last six years, it is currently not universal, and therefore a mandatory approach is necessary to enable monitoring and verification of compliance with animal welfare requirements.

Camera Positioning

The accurate installation of CCTV cameras - positioned to ensure a clear and continuous view of processes including unloading from vehicles, restraint, stunning and neck cutting - is necessary. Such installation will enable each of these processes to be monitored at all times.

Retaining footage

For accurate representation, recorded footage should be retained for a period of at least 90 days. All slaughterhouses within the RSPCA Assured Scheme already comply with this standard, illustrating that this approach should not cause issue. Where footage can be retained for longer, this would provide further opportunity to examine historic practice.

Access to footage

Unconstrained access to CCTV (real time and stored) for authorised officers, such as Official Veterinarians, is an essential requirement to ensure its effectiveness. This will ensure that compliance with the regulations can be assessed, both proactively and retrospectively.

Size of establishments

Protecting farm animal welfare is just as important at smaller sites as it is a larger ones. Installing CCTV has been demonstrated to be economically viable for the 50% of red meat slaughterhouses and 70% of poultry slaughterhouses that have already installed CCTV voluntarily⁴. However, the economics of installing such equipment in smaller slaughterhouses is unknown, and there are concerns that this could become a financial burden for smaller establishments. The numbers of smaller slaughterhouses has decreased in recent years, with 384 in 2001⁵, and 251 currently⁶, leaving some parts of the country without a local slaughterhouse. Without the infrastructure of smaller meat plants, local processing of meat becomes difficult and expensive for local farmers and butchers marketing locally produced meat. The lack of local establishments increases travel distance, which has its own implications on animal welfare, meat quality and hygiene. Despite this, fully exempting small businesses from installing CCTV would undermine the delivery and effectiveness of the Government's policy objectives. Therefore, particular care may be needed in relation to the smallest slaughterhouses to ensure they are not forced to close.

Conclusion

Low standards of animal welfare by slaughterhouses generates wider adverse reputational costs for the whole sector, including the compliant majority. Not installing CCTV could undermine public and consumer confidence, causing a negative economic impact on the

⁴ https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses/supporting_documents/CCTV%20internal%20impact%20assessment%20%20final.pdf

⁵ <http://webarchive.nationalarchives.gov.uk/20101211045151/http://www.food.gov.uk/multimedia/pdfs/meatinspectionchanges.pdf>

⁶ Using Food Standards Authority data.

industry.

High animal welfare standards are important for the public. Mandatory CCTV should lead to improved compliance by the sector, and in turn improve the welfare of farm animals at slaughter. Mandatory recording may therefore support improved public and consumer confidence that welfare standards are being delivered by the industry.