

Mandatory Closed Circuit Television (CCTV) recording in slaughterhouses

Summary of responses and government response

November 2017

Contents

Introduction	1
Consultation responses	2
Cost of the proposal.....	11
Animal welfare	17
Annex 1: List of consultation questions.....	19
Annex 2: List of respondents in CCTV consultation.....	20
Annex 3: Glossary	23

Introduction

1. This document summarises the responses we received to our consultation on mandatory Closed Circuit Television (CCTV) recording in slaughterhouses and sets out the actions we will now take. The consultation started on 11 August 2017 and closed on 21 September 2017.
2. The purpose of the consultation was to seek views on a proposal for mandatory CCTV recording in all slaughterhouses and unfettered access to coverage for authorised officers in order to improve animal welfare.
3. The government is committed to making CCTV recording in slaughterhouses mandatory.
4. The proposal outlined relates solely to England as animal welfare policy is devolved.

5. Respondents were invited to give some details for administrative and classification purposes.

Consultation responses

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

6. Total responses to the consultation were 3,869, of which 3,752 were from the general public. The breakdown of responses by type of organisation is shown in the table below. The overwhelming result was in favour of mandatory CCTV recording in slaughterhouses except for the responses from abattoirs and the slaughter industry, where support for and against CCTV was more evenly balanced.

Category (3869)	Mandatory CCTV			
	Yes	No	Un-answered	Total
Abattoir	6	6	1	13
Animal welfare charity	20			20
CCTV/IT company	4			4
Farmer/farm	31	2		33
FSA	1			1
General public (non-farm)	3737	5	10	3752
Industry body	9	4		13
Regulatory bodies		1	1	2
Local authorities	7			7
Vet/Vet bodies	23	1		24
Totals	3838	19	12	3869

7. Abattoirs that said yes to mandatory CCTV cited assurance of high welfare, transparency and consumer confidence as well as its deterrent effect. Abattoirs not in

favour preferred a voluntary approach to CCTV in conjunction with a protocol such as that agreed between industry and the Food Standards Agency (FSA). Some suggested that small plants, operating part-time, where officials could readily see all operations did not warrant mandatory CCTV. Some also suggested that compulsion should be based on history of welfare compliance. All agreed that CCTV review should not replace the physical observations of the Official Veterinarians (OV) and Food Business Operator (FBO).

8. Many Animal Welfare NGOs cited covert filming of serious animal welfare abuses in 93% of those slaughterhouses targeted, as well as FSA reports of non-compliances, as evidence of the need for CCTV to be installed and monitored in all slaughterhouses. Monitoring and review of mandatory CCTV recording was predicted to have multiple benefits including a deterrent effect, improving slaughterhouse practices, enabling investigation and prosecution of welfare problems, preventing abusive behaviour towards OVs, addressing public concern and improving consumer confidence. World Horse Welfare noted that market pressure for CCTV was not present in horse slaughter but there was a need to increase confidence in horse owners that slaughter was a humane end of life choice.

9. Farmer respondents were almost all in favour of mandatory CCTV recording in slaughterhouses for its deterrent effect and disciplinary purposes but also for staff training. There were concerns expressed about the reputational damage to the food chain of animal welfare exposés in the slaughter sector and the loss of consumer confidence. Some wanted to be personally assured that they were sending their animals to a slaughterhouse that would protect the welfare of their animals.

10. The FSA supports mandatory CCTV recording in approved slaughterhouses where live animals are present and considers that CCTV can be a useful additional tool within its suite of welfare assurance controls. CCTV at the unloading stage in a slaughterhouse is considered critical to help successfully identify the state an animal is in when it arrives. Handling points and the stun/kill area are also high risk areas. Audio recording was said to have helped in prosecutions but this aspect was not consulted on.

11. The members of the general public that responded were overwhelmingly in favour of the proposals most citing the need to protect animal welfare in the face of exposés in the media. There was a need for a deterrent to prevent abuses and a method of holding slaughterhouses accountable and to ensure compliance with welfare standards. It was said that consumer's world-wide needed to be assured of and have confidence in the GBs high animal welfare standards. There were some concerns expressed about privacy issues. 12. Industry bodies that responded were split on whether there should be mandatory CCTV recording in slaughterhouses. Those in favour cited evidence of animal welfare exposés impacting on consumer confidence at home and abroad, transparency, deterrent effect and improved efficiency of monitoring as drivers but felt that there should be clear guidance on specifications and that its use should not replace the physical observations by FBO and OVs.

13. Some industry body respondents who were against regulation did recognise benefits of CCTV to FBOs but preferred a voluntary or risk based approach. Some suggested that the case for CCTV had not been sufficiently made without objective evidence being found by the Farm Animal Welfare Committee (FAWC) or in FSA surveys that CCTV made a difference to animal welfare outcomes. The view was expressed that the slaughterhouse sector should not be discriminated against or criminalised without cause when the majority of welfare issues originated on farm, in transport and at markets. It was also suggested that the human rights of workers needed to be sufficiently considered.

14. The Information Commissioners Office, responsible for promotion and enforcement of the Data Protection Act 1998 (DPA) responded to the consultation. While the importance of monitoring and enforcement of animal welfare and reassuring consumers was understood, it was considered likely that CCTV will capture personal data of individuals so fall within the scope of the DPA. It was confirmed that workers can be monitored but processing of personal data needs to be proportionate and transparent, i.e. workers need to be aware. Mandating CCTV in slaughterhouses as a proportionate response to concerns about animal welfare standards in slaughterhouse could represent a justifiable interference in the privacy of individuals under the Human Rights Act 1998 (HRA). Data controllers, i.e. the FBOs, will also need to comply with the new General Data Protection Regulation (EU) 2016/679 from May 2018.

15. The Surveillance Camera Commissioner added that for CCTV in slaughterhouses to be effective installation should follow an operational requirement as set out in the "Passport to Compliance" on his GOV.UK webpage. Installations in slaughterhouses should comply with the Surveillance Camera Code of Practice.

16. All local authority respondents were in favour of mandatory CCTV recording in slaughterhouses. They suggested that it would protect animal welfare, enable enforcement, and provide accountability, transparency and public confidence. Careful siting of cameras and good image quality was considered necessary for enforcement.

17. Veterinarians and veterinary organisations were comprehensively in favour of mandatory CCTV recording in slaughterhouses. They recognised that the OV could not be in all places at all times and suggested that CCTV recording of all live animal operations could provide an objective view that could be viewed in real time or retrospectively to protect animal welfare, deter poor behaviours, assess production systems and resolve incidents. Vets said that slaughterhouse staff should feel a sense of responsibility and respect for the welfare of animals and CCTV could help instil this as well as being less intrusive than being observed. However, the view was expressed that CCTV should not reduce or replace physical observations by the OV. It was suggested that FBOs could benefit from the proposals allowing them to assess their own systems and reassure customers and their staff could be protected from unfounded accusations. There was concern expressed that training for slaughterhouse staff should first be improved so they

appreciated the animal welfare needs of the animals in their care. It was also said that cameras were vulnerable to damage and being inappropriately placed.

18. A combined response from the British Veterinary Association (BVA), the Veterinary Public Health Association (VPHA) and the Association of Government Vets (AGV) (largely supported by a response from the Royal College of Veterinary Surgeons (RCVS)) supported CCTV in all live animal areas as a valuable additional enforcement measure, but one which should not reduce or replace physical monitoring. It was said that CCTV recording would increase opportunity to observe and verify handling and stunning operations and protect public health, thus increasing consumer confidence. CCTV was also thought to provide an accurate view of day-to-day working practices enabling improvement of slaughter processes. It could also be a valuable training tool for the FBO. It was suggested that clear and unobstructed recording of all live animal areas would be necessary with adequate maintenance and prevention of interference to ensure effective recordings and that picture quality, in terms of pixel counts and frames per second, would need to be of a standard acceptable as evidence.

Government response

- The government agrees with the overwhelming proportion of respondents that were in favour of mandatory CCTV to protect animal welfare.
- We have carefully considered all views and will work with regulatory bodies as we develop our policy.
- We will discuss further with regulatory bodies on the technical specifications that will provide a clear and complete view of operations and include this in guidance.
- The government will proceed with its manifesto commitment to introduce mandatory CCTV recording in slaughterhouses.

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.

19. Again, the overwhelming response to this question was yes, that 90 days was a reasonable retention period for CCTV footage taken in slaughterhouses. Some industry respondents felt that 90 days was too long.

Category (3869)	90 day footage retention			
	Yes	No	Un-answered	Total
Abattoir	4	8	1	13
Animal welfare charity	20			20
CCTV/IT company	1	3		4
Farmer/farm	31	2		33
FSA	1			1
General public (non-farm)	3528	156	68	3752
Industry body	8	5		13
Regulatory bodies	1		1	2
Local authorities	7			7
Vet/Vet bodies	20	3	1	24
Totals	3621	177	71	3869

20. Abattoirs against a 90 day retention period suggested that welfare incidents needed to be reviewed in a timely fashion and animal welfare abuses dealt with urgently and that between 7 and 14 days retention should be sufficient for this purpose. Retention beyond this was only considered necessary for evidential purposes. Some cited that the DPA required that organisations should keep images only as long as necessary.

21. RSPCA reported that their own assurance standards (worked to by 46 slaughterhouses) already required 3 months retention period and other assurance standards (e.g. retailers) would have their own retention periods. Many NGO respondents said that lengthy retention would cost-effectively enable monitors to establish duration of poor practice as well as patterns of behaviour or systematic failings. Suggestions were made between 3 months as a minimum to 12 months retention for establishing patterns or, interestingly, as a data set for assessment of welfare outcomes for research or certification bodies.

22. CCTV suppliers that responded all felt that retention for 90 days in on-site storage facilities could prove expensive and a CCTV industry standard retention period was put at 30 days. A shorter retention was thought to be an incentive to more regular review of stored footage. One respondent noted that secure cloud-based storage would be cheaper to provide, negating the need for on-site storage and could be accessible to those that needed it, i.e. the FBO and FSA.

23. FSA support retention of recordings for 90 days, in line with existing assurance requirements (e.g. RSPCA Assured standards). This will enable patterns of behaviour or

systematic failings to be assessed, however, CCTV should be viewed immediately once non-compliance is suspected.

24. Industry body respondents were also split on the need for CCTV footage to be retained for 90 days. Those in favour said there should be sufficient retention time for audits and for samples of recordings to be reviewed and for any trends or systematic problems to be established.

25. Those industry bodies not in favour of 90 day retention felt that review for welfare issues should be done in a much more timely fashion. They supported some abattoirs' view that under the DPA images should only be kept as long as necessary to meet the purpose of recording them. It was also not clear why 90 days had been chosen, other than in line with an assurance scheme, and what the justification was for this period. Retention periods between 10 and 30 days were proposed (the greater of these being an industry norm in larger poultry plants, which would have storage problems with much more retention time). Many had concerns about security of stored footage and the dangers of unintended release.

26. The Information Commissioners Office said that retention of images should be for as long as is necessary for the purpose for which it was collected and recordings should only be used for the purpose collected.

27. The Surveillance Camera Commissioner said that data retention should be dependent on the purpose of its collection. 90 days would need to be justified and 30 days was more usual.

28. All local authority respondents were in favour of 90 day retention of footage to allow time for investigations.

29. Veterinarians were largely supportive of 90 day retention of footage for review, auditing and evidential purposes but some felt that OV review of footage should be more timely and suggested periods of between 21 and 30 days would be more reasonable. Veterinary representative organisations responding supported 90 day retention on the basis that FAWC recommended this and it was already required by several retailer and RSPCA assurance schemes. They also suggested protocols for monitoring and training in observational techniques and data security for those accessing the systems. It was thought that FBOs might want to retain footage for training purposes and to review slaughterhouse processes

Government response

- We have considered carefully the views expressed in the development of our policy.
- On balance we have decided that a 90 day retention period of CCTV recordings by the FBO should be required. OVs need to carry out a timely review of CCTV in

order to address any welfare incidents and for decisions to be made as to the advisory or enforcement action to be taken. Whilst a shorter retention period will reduce the storage capacity required over time the costs of storage may decline in future in line with IT innovations such as cloud storage. Whilst OV's should conduct timely reviews of possible breaches, retention for 90 days would enable OV's to double check if there has been a longer history of practices, patterns of behaviour or systemic failures which were hitherto unnoticed.

- The FSA has stated that a retention period of 90 days would meet their requirements. This time period is also the same as that required for some commercial, farm assurance and retailer assurance audit processes.

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.

30. There was overwhelming support from the general public and from welfare NGOs for authorised persons, such as OV's, to have unfettered access to CCTV recordings. Abattoirs that responded were not in favour and industry bodies were finely divided.

Category (3869)	Unfettered access			
	Yes	No	Un-answered	Total
Abattoir	1	8	4	13
Animal welfare charity	19		1	20
CCTV/IT company	4			4
Farmer/farm	32	1		33
FSA	1			1
General public (non-farm)	3683	14	55	3752
Industry body	7	5	1	13
Regulatory bodies		1	1	2
Local authorities	7			7
Vet/Vet bodies	24			24

Totals	3778	29	62	3869
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31. Most abattoirs said that access to their CCTV recordings for OV's should be on request with FBO present, in line with a protocol similar to that already agreed between FSA and industry. Some cited DPA and security concerns as reasons for limiting access to CCTV footage. The view was also expressed that OV's should spend their time more usefully in direct observation of slaughterhouse practices. Those viewing CCTV footage should be trained and experienced as well as aware of DPA requirements.

32. Many animal welfare NGOs believed the improvement of effectiveness of monitoring and enforcement in slaughterhouses enabled by unfettered access to CCTV for OV's to be an inevitable contributor to better animal welfare in slaughterhouses and increased consumer confidence. Access to review incidents that occurred when the OV had not been present was also thought to be necessary. Some thought unfettered access vital to the credibility of the government's proposals. Many NGOs suggested an oversight group or independent monitors of CCTV footage in slaughterhouses and some said that access should also be open to others such as the police and reputable NGOs.

33. Some CCTV suppliers noted that with certain CCTV storage systems there was the possibility of remote access, but they advised that procedures for recording access should also be put in place.

34. The vast majority of farmer respondents agreed with unfettered access for OV's but some would extend this to an independent monitoring body or to animal keepers, abattoir staff and wider animal welfare interests. It was said that slaughterhouse staff had to understand they were being monitored at all times to maintain good behaviours.

35. The FSA supports unfettered access to CCTV recordings. Access issues and poor quality CCTV systems have in the past limited the usefulness of footage for enforcement purposes. Where on the premises (or remotely) the CCTV footage is viewed could be an issue; the equipment and footage remain the property of the FBO until required for evidential purposes. It was reported that there has been resistance in the past from FBOs to providing CCTV footage, so it would be necessary for the FBO to have processes in place to enable provision of required footage.

36. Industry bodies were split on unfettered access to CCTV recordings. Some of those in favour suggested that access would avoid excuses about lost or deleted footage and that the point of the policy would be lost without access for authorised officers. Some suggested that the protocol agreed between industry and the FSA should form the basis of access. Many expressed concerns about the security of CCTV footage and would wish to see access for FSA personnel only in the presence of FBO staff. It was suggested that footage should remain FBO property and, as they were not public authorities, it would not, therefore, be subject to Freedom of Information requests. Some of those industry organisations against unfettered access thought that allowing months of footage of staff to

be available to be reviewed was unprecedented and that such blanket surveillance was unethical and against the rights of workers. Physical observation by the OV was considered much more effective and there were concerns expressed about “fishing trips” of CCTV by OVs. Some suggested that access to footage should be risk-based. Random sampling footage from large plants with multiple cameras and operating long hours was said by some to be ineffectual (e.g. around 675 days of footage resulting from multiple cameras and long working days in a 90 day period). Problems with recruitment and retention of staff because of the level of surveillance was also a concern expressed by some.

37. Media were all positive about unfettered access for OVs and some suggested an independent monitoring body in addition.

38. MPs responding supported unfettered access for OVs as a deterrent and to indicate the extent of any systemic problems. An independent monitor was also suggested.

39. The Information Commissioners Office said that access to footage should be limited to those who require it and supported by appropriate security arrangements and audit.

40. Local authorities agreed that that enforcers, including their own officers, should have access for investigations.

41. Veterinarians and their organisations said that a lack of unfettered access for OVs would defeat the object of a mandatory CCTV policy and that OVs should be able to have ready access to verify compliance with the rules and to identify non-compliances. This could provide the opportunity to view an incident again that was seen on the slaughter line; review footage when the OV could not be physically present to monitor slaughter operations and investigate issues discovered at post mortem inspection. CCTV recording would make slaughter staff aware they could be monitored at all times. Some suggested that levels of monitoring could be set by level of animal welfare risk. A couple of responses also suggested an independent monitoring body. It was suggested that there needed to be a more expedient approach if the FBO refuses access than currently provided for in WATOK.

Government response

- Government will legislate for unfettered access to CCTV recordings for monitoring, verification and enforcement purposes by those who require it for these purposes.
- The FSA is involved in regulating and enforcing welfare in the slaughterhouse and we, therefore, do not deem it necessary to appoint an additional independent monitoring body to consider CCTV footage.
- Freedom of Information legislation applies to public bodies and, therefore, as CCTV recorded footage remains the property of the FBO it will not apply.

Cost of the proposal

42. An internal Impact Assessment (IA) was prepared to outline the possible costs and benefits of the proposed reforms and was made available to view alongside the consultation at <https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses>. We estimated 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.

43. While voluntary uptake of CCTV in slaughterhouses has increased with the majority of animal throughput covered, the increase in CCTV uptake has stalled with around 50% of red meat slaughterhouses and around 70% of poultry slaughterhouses having adopted CCTV for animal welfare purposes by 2016. Our intention is to raise the rest of the sector to a defined standard.

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.

44. Many abattoir respondents said that the cost would be too high for small slaughterhouses, threatening their viability. Only one quoted actual costs of £10,000 for installation of a six camera system and monitoring/recording equipment and £3,500 per year maintenance.

45. There was concern expressed by abattoirs that slaughterhouse staff recruitment and retention could be damaged by blanket CCTV surveillance. Others questioned the public and industry benefits identified in the IA.

46. Animal welfare NGOs cited the 50% of red meat slaughterhouses and 70% of white meat slaughterhouses currently with CCTV installed for animal welfare purposes and the 46 slaughterhouses operating under the RSPCA Assured standards as evidence of the viability of CCTV in the market. CCTV recording was described as the most cost effective way of increasing inspection coverage throughout the slaughterhouse sector. It was said that the cost of CCTV equipment was falling and technology advancing, although an unidentified cost was suggested to be the development of CCTV protocols and staff

training. The hope was expressed that the presence of CCTV would foster good practice. Many suggested that the benefit to animals and to consumer assurance in the industry's animal welfare credentials would outweigh any costs. A net benefit to industry was suggested if meat sales increased as a result of improved consumer confidence and it was noted that good animal welfare was often reflected in good meat quality, also in the industry's favour.

47. The Humane Slaughter Association felt that the costs quoted in the IA might be low. They suggested that £7,000 for installation of a multi camera system was more realistic, with £1,500 for digital equipment to cover each additional area in incomplete systems.

48. One CCTV supplier said that while standard CCTV systems with on-site storage were considered expensive options, especially for small plants, secure cloud based systems would make installations cheaper. Others cautioned against 'not for purpose' installations that smaller premises might be tempted to opt for to reduce costs and suggested that government offer guidance on standard requirements that would meet the needs of the legislation so that FBOs could install systems confident they would be in compliance.

49. Some farmer respondents said that industry should absorb what was a relatively small cost and that increased consumer confidence might increase sales to compensate. Some said that higher animal welfare standards, including for exports, would outweigh the costs that would need to be paid for through the food chain. However, concerns were also expressed about the cost to small business without an identified increase in profits, potentially impacting on rural areas and travel times for animals if small abattoirs closed.

50. FSA consider the cost of installation and implementation might be underestimated in the internal impact assessment. Upgrading current systems to evidential quality might require more equipment. There may also be as yet unidentified costs to FBOs for data protection obligations, informing staff, signage, registration with Information Commissioners Office, etc. FSA also suggested that their costs may not be neutral as predicted since CCTV in slaughterhouses may lead to additional audit and assurance activities for authorised officers (and potentially more enforcement action) and may thus imply additional resource and training (e.g. in observational techniques particular to CCTV footage and data protection issues). However, the improved quality of evidence resulting from CCTV could reduce prosecution costs.

51. Industry bodies' views on costs and benefits varied from those that felt that many had already installed suitable CCTV technology and that for them it was viable to those that felt that the Impact Appraisal (IA) had underestimated installation costs, had not included other indirect costs to the FBO and FSA and would disproportionately impact on small slaughterhouses, driving some out of business. They suggested that clear specifications should be set out for installations to avoid wasted resources. Many said that major benefits would be improved customer confidence and support for British produce in

domestic and export markets. There were calls for assistance from government ranging from guidance to financial support, but others said that the costs should be borne by the processing sector, particularly not passing these costs back to primary producers. Concern was expressed that the relationship between FBO and FSA could be damaged by the process of making CCTV mandatory.

52. Many public responses suggested that the animal welfare and other benefits outweighed the costs of CCTV, which in any case was thought to be minimal per business. CCTV was predicted to deter and detect animal welfare problems, help staff training, protect the business owner, provide less stressful conditions for animals that could improve meat quality and also improve consumer and market confidence.

53. Local authority respondents said that the cost of installation should be balanced by benefits to investigators and to FBOs. Most said the cost should be borne by the processing sector and farming community as a commitment to animal welfare, which would be paid off by public confidence in the meat industry.

54. Most veterinarians responding said that the necessary cost of CCTV was outweighed by the benefits to animal welfare, OV efficiency, public health, public confidence, slaughterhouse staff and FBOs. Plant standards and systems would improve as a result of the process and staff could be protected from criticism. Some suggested that proactive prevention via CCTV monitoring would also be less costly than reactive/punitive measures, although FSA costs might also rise. Additional costs might also be maintenance and replacement of equipment operating in a harsh environment

Government response

- On the basis of the responses government believes that the average costs quoted in the Internal Impact Assessment are reasonably accurate, but that storage costs may be very slightly higher.
- Smaller premises will require smaller CCTV systems with proportionately lower costs.
- Government agrees with many respondents that the gains to animal welfare and the many other benefits identified in the responses to consultation (and previously in FAWC's report) justify the costs involved.
- Slaughterhouses with existing CCTV systems will only incur costs if cameras are not sited in all areas where live animals are unloaded, kept, handled, stunned or killed and so will need to enhance their current systems.

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

55. The vast majority of respondents felt that CCTV should be installed in all approved slaughterhouses.

Category (3869)	CCTV in all slaughterhouses			
	Yes	No	Un-answered	Total
Abattoir	6	4	3	13
Animal welfare charity	19		1	20
CCTV/IT company	4			4
Farmer/farm	30	3		33
FSA	1			1
General public (non-farm)	3641	18	93	3752
Industry body	8	4	1	13
Regulatory bodies		1	1	2
Local authorities	7			7
Vet/Vet bodies	24			24
Totals	3740	30	99	3869

56. Some abattoirs suggested that the rules should apply to all plants consistently, while others said that smaller premises where all operations were easily visible to the OV might be exempted. Some indicated that covert filming in smaller abattoirs suggested that the welfare risk in these plants was no less than in larger plants, if not higher. The impact of welfare incidents on animals would be the same regardless of plant size.

57. Most animal welfare NGOs said that the rules should be applied independent of the size of the slaughterhouse business since animal welfare issues had been detected in all manner of slaughterhouses and their impact on animals was the same regardless of scale: all animals deserved protection under the law. Smaller sites would have smaller CCTV system requirements and thus proportionate costs. The Humane Slaughter Association would ideally see CCTV in all slaughterhouses but did note that small plants in remote areas could reduce travel time to slaughter and that some of these, also running part time, could be effectively assessed by OVs on the floor of the plant and so suggested that a risk based approach to very small operations should be considered.

58. Most farmer respondents agreed, and the FSA concurred, that the size of slaughterhouse was not a determinant of animal welfare compliance and all animals should receive uniform protection. There was a suggestion that body cameras worn by officials might replace the need for CCTV in very small plants but it is unclear how this proposal would meet the requirement for CCTV of all live animals at all times to be met.

59. Industry bodies suggested either that all approved slaughterhouses should be covered for a level playing field and to protect all animals or that smaller slaughterhouses would be disproportionately impacted and might be exempted (e.g. legislation only applied to those slaughtering more than 200 livestock units a week). It was said that in very small plants all operations could be seen from one place so CCTV was not necessary. Some suggested that the rules should be applied on a risk based system, i.e. as a result of unsatisfactory welfare reports.

60. Public respondents said that animal welfare should be protected regardless of the size of slaughterhouses and that loopholes should not be introduced.

61. The Surveillance Camera Commissioner said that there was a need for a proportionate approach and strong justification for full industry compliance. It was suggested that the requirement for surveillance might be based on a slaughterhouse's track record on animal welfare.

62. Many veterinarians said that size of slaughterhouse did not materially affect the risk to animal welfare and that all animals should receive equal protection. The view was expressed that operators of small slaughterhouses had the same responsibilities to animal welfare as those in large plants and would reap similar benefits and that animal welfare should be improved across the industry. Some noted that plants with low throughput would not require an Animal Welfare Officer (AWO – a person required to be appointed by the FBO with responsibility for monitoring animal welfare in the slaughterhouse) and very low throughput ones may not have a full time OV. CCTV in these plants would provide extra assurance of compliance with welfare standards but if these plants did not have to have CCTV then they should be subject to full attendance by FSA. Small plants would need smaller CCTV systems at lower cost, probably less than enhanced official controls. Either way welfare supervision would not suffer.

Government response

- Government believes that requirements for mandatory CCTV recording should be applied to all approved slaughterhouses. Installations of CCTV and their use will be proportionate to size of premises and throughput. Many larger slaughterhouses have already voluntarily installed CCTV. Further improvements to oversight, compliance and enforcement across the sector therefore involve extending CCTV to smaller slaughterhouses.

- Whilst a few responses suggested CCTV should be required in response to a slaughterhouse's poor track record the government does not feel that this would support effective monitoring, validation and enforcement activity across the industry or be in the interest of the sector in demonstrating due diligence.
- All animals should be offered the same level of protection at the time of killing.

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

63. Abattoir respondents, CCTV suppliers, industry bodies, local authorities, FSA and veterinarians suggested that government might subsidise costs of installation of CCTV to various extents, possibly dependent on throughput. Some NGOs suggested that smaller businesses should be subsidised by industry bodies and a media comment was that retailer sponsorship might be forthcoming.

64. Abattoir respondents, NGOs, CCTV suppliers, farmers, industry bodies and media said that guidance should be provided on the minimum standard of CCTV installation requirements but also on how this affected FBOs DPA responsibilities. CCTV suppliers suggested that government offer a positive message on the benefits of CCTV to FBOs as well as to animal welfare.

65. Abattoir respondents, NGOs, farmers, industry bodies and FSA suggested that small businesses should have sufficient time to implement the CCTV requirements.

66. Some animal welfare NGOs and veterinary respondents said that there should be no difference of approach to small slaughterhouse businesses to enable all animals at slaughter to be protected. Those small plants that already had CCTV and remained viable seemed to argue that it could be done. Most farmer respondents and some industry bodies saw the cost of CCTV as an operating cost to meat processing businesses, even small businesses, to bear.

67. Some industry bodies proposed that small plants should be exempt or that CCTV should only be required on a risk basis. Vets supported a risk based approach to small businesses. There was concern expressed that small slaughterhouses should not be driven out of the market as they reduced travel times and had other local advantages.

Government response

- Government will allow a reasonable transition period from the coming into force of the legislation to help slaughterhouses to comply with requirements for mandatory CCTV recording.

- Government will consider with other regulatory bodies what guidance can be provided on technical specifications and data protection to enable slaughterhouse operators to comply with their legislative responsibilities.
- In view of the considerable gains to animal welfare and the many other benefits identified, particularly for the FBO, in the responses to consultation (and previously in FAWC's report) the government does not deem financial support to be appropriate.

Animal welfare

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

68. Most abattoir respondents said that CCTV should be recognised as very much a minor complement to the OV and FBO staff being physically present to observe slaughterhouse practices and protect animal welfare. In particular CCTV could not assess loss of consciousness. Others recognised the role that CCTV can play in training the workforce. It was noted that the field of view for cameras would be important in assessing operations effectively.

69. A number of animal welfare NGOs suggested that the presence and monitoring of CCTV in slaughterhouses should lead to animals being treated with more respect. It might also reduce or document health and safety incidents and deter firearms thefts and bullying of OV, Meat Hygiene Inspectors (MHIs) and slaughterhouse staff. Some suggested that CCTV proposals would raise public awareness of welfare at slaughter issues more generally. The Horse Welfare Society said that increased confidence in slaughterhouses could reduce the number of abandoned or neglected horses at end of life as well as the number of those that had their lives extended unnecessarily with poor welfare as a result. This could also increase the industry's viability.

70. One farmer respondent said that poor welfare in the slaughterhouse led to poor meat quality so it was in the industry's interest to work to high animal welfare standards.

71. FSA noted that unobserved monitoring placed less pressure on slaughterhouse staff.

72. One industry body noted that welfare outcome data might be able to be logged by data-capture CCTV recording, e.g. intact tails on pigs and lameness in all species, to enhance supply chain efficiency. Another said that CCTV could assist training of staff to understand their impact on animals, i.e. unstressed animals produced better quality meat.

73. Veterinary respondents commented that CCTV could offer good clear evidence if image quality was sufficient. UK leadership in animal welfare standards could be supported by CCTV.

Government response

- Government welcomes the additional welfare benefits identified and believes that mandatory CCTV recording in slaughterhouses will improve animal welfare standards in all approved slaughterhouses and provide assurance that this is the case.
- Government also recognises the considerable benefits that can accrue to the industry from the structured use of CCTV in slaughterhouses, from in-house assessment of operations and effective staff training to increased public confidence in the meat industry and its adherence to our high animal welfare standards.

Annex 1: List of consultation questions

Question 1: Your name.

Question 2: Your e-mail address.

Question 3: Your organisation.

Question 4: Should there be mandatory CCTV recording in all approved slaughterhouses in areas where live animals are present? Please give reasons for your response.

Question 5: Is it reasonable to require Food Business Operators to retain CCTV footage for 90 days? Please give reasons for your response.

Question 6: 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.

Question 7: 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.

Question 8: 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.

Question 9: Are there other potential economic benefits or costs not set out in the Impact Assessment? Please provide evidence to support your response.

Question 10: Should CCTV be installed in all approved slaughterhouses, regardless of size? Please provide justification for your response.

Question 11: What do you think government could do to help small businesses comply? Please provide justification for your response.

Question 12: Have we identified the main potential animal welfare gains from CCTV in slaughterhouses? Please give any other potential animal welfare gains.

Annex 2: List of respondents in CCTV consultation

Abattoirs:

ABP UK

Alec Jarrett Ltd

Cranswick Country Foods

Dawn Meats

Dovecote Park Ltd

Dunbia

Euro Quality Lambs Ltd

Foyle Food Group

LE George Butchers

FA Gill Ltd

M Nijab & Sons

Tideford Abattoir

HP Westwood Ltd

Animal welfare charities:

Animal Aid

Animal Equality

Cat Chat, The Cat Rescue Resource

Compassion in World Farming

Conservative Animal Welfare Foundation

Eyes On Animals

Garston Animal Rescue

The Humane League UK

The Humane Slaughter Association

Montgomery Voice for Animals

Passive Pressure Animal Welfare Group

The Pembrokeshire Animal Welfare Trust

Powys Animal Welfare

The Purple Saltire Association

RSPCA

Quaker Concern for Animals

South Wales Animal Save

Swindon Animal Concern

World Horse Welfare

CCTV/IT companies:

Abattoir Equipment Supplies

Cloudview UK Limited

MPCOM LTD

Secure Force UK Ltd

General public (33752)

Industry bodies:

Association of Independent Meat Suppliers

Association of Meat Inspectors

British Meat Processors Association

British Poultry Council

Chartered Trading Standards Institute (CTSI)

Farmwel

National Farmers Union (NFU)

National Farmers Union (poultry team)

National Federation of Meat and Food Traders

National Pig Association

Retired slaughterhouse employee

Shechita UK

UNISON

Other Government Departments:

Information Commissioners Office

Surveillance Camera Commissioner

Trading standards/Local authorities

Essex Trading Standards

Kirklees Council

Leeds City Council

Leicestershire County Council

Leicestershire County Council

Sheffield City Council

Suffolk County Council Trading Standards

Vets/Vet bodies:

Barn Lodge Vet Hospital

BVA, VPHA, AND AGV

Falklands Island Govt Vet Service

New Forest Equine Vets

RCVS

Small World Vet Centre

18 individual veterinarians

Annex 3: Glossary

AWO: Animal welfare officer

CCTV: Closed circuit television

DPA: Data protection act

FAWC: Farm Animal Welfare Committee

FBO: Food business operator

FSA: Food Standards Agency

IA: Impact assessment

MHI: Meat hygiene inspectors

NGO: Non-governmental organisation

OV: Official veterinarians

WATOK: Welfare of animals at the time of killing



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