

**The Need for and Possible Implementation of a Workable System of CCTV
in All Slaughterhouses in Wales**

The Safeguarding Animal Welfare at Slaughter Task and Finish Group

October 2016

Summary

The group studied the number and type of welfare incidents recorded in abattoirs in Wales in 2015 alongside the throughput of animals in Welsh plants. Additionally, we considered the FAWC Opinion on the use of CCTV in abattoirs published in February 2015. In that Opinion they concluded that CCTV was a useful tool, but did not necessarily lead to better welfare outcomes.

We came to the following conclusions and recommendations:

Conclusions

- There are a number of controls already in place in Welsh abattoirs, from the permanent presence of an official veterinarian with responsibility for overseeing the correct implementation of welfare measures and a daily recording of any incidents to the requirements of Regulation (EC) 1099/2009 for abattoirs to have standard operating procedures on protecting the welfare of animals at all points of the operation, which are reviewed by the OV and at audit time.
- The BMPA and the BPC have also within the last year published extensive Guides to Good Practice on protecting animal welfare at the time of killing ([Red meat](#). White meat). They are free and on their websites, available to all abattoirs.
- Many abattoirs, particularly the large abattoirs handling the majority of animals, are members of various assurance schemes, such as Red Tractor and Freedom Foods. These make additional animal welfare requirements and impose additional audits on abattoirs. Freedom Food sites have to install CCTV and give the auditors access to the footage.
- The working group has concluded that CCTV is a useful additional tool in abattoirs for helping raise standards of animal welfare, particularly where it can be used as a training tool.

Recommendations

- Based on the number **and** type of welfare incidents in abattoirs recorded by the FSA in 2015, particularly looking at the split of incidents between abattoirs that already use CCTV and those that do not, and based on the conclusions reached by FAWC in their extensive Opinion, **there is simply not sufficient basis on which to make CCTV a mandatory requirement in abattoirs in Wales.**
- There is, however, **reason to encourage abattoirs to install and use CCTV effectively for training purposes**, for example, if the stun area is hard to observe.
- If a site has installed a CCTV system, then cameras in the unloading and lairage area may record injuries sustained in transport, the time of highest risk to animals.
- **We have provided a checklist (see Annex 1) to help abattoirs identify whether or not they would benefit from CCTV**, even if in only some areas of the plant.

- We **would like to see grants available to assist small sites invest in the equipment**, but we understand that such grants can only be given if demonstrably for growing business.
- We would like to **see additional focus on the improvement of welfare of animals during transport to slaughter**.
- **This group would be happy to meet twice yearly with Welsh Government officials to discuss welfare of animals during slaughter as appropriate.**

1. The Use of CCTV in Abattoirs in Wales

In 2014 the Welsh Government asked the Farm Animal Welfare Committee (FAWC) to consider the matter of CCTV in abattoirs after video footage from some NGOs (in England) showing incidents compromising animal welfare and after concern expressed by some members of the public about animal welfare in abattoirs generally.

This report has been produced by a working group - Safeguarding Animal Welfare at Slaughter Task and Finish Group – made up of representatives from the abattoir industry in Wales. This group was established at the invitation of Rebecca Evans, the Deputy Minister for Food and Farming in the Welsh Government. The group's terms of reference were to explore the need for and possible implementation of a workable system of CCTV in all slaughterhouses in Wales. Membership comprised:

- Cig Oen Caron
- William Lloyd Williams & Son
- Association of Independent Meat Suppliers
- British Meat Processors Association
- National Federation of Meat and Food Traders
- Food Standards Agency – Wales
- Welsh Government officials

In considering the use of CCTV in Welsh abattoirs, the group looked at the FAWC report, the FSA's records of animal welfare incidents over the last year in Welsh abattoirs, and its members' industry experience to develop its recommendations.

2. Current Situation in Wales

There are three principle acts of legislation governing the operations of abattoirs in Wales: Regulation (EC) 854/2004 on the organisation of official controls, Regulation (EC) 1099/2009 on the protection of animals at the time of killing, and the Welfare of Animals at the Time of Killing (Wales) Regulations 2014 (WATOK). Regulation 854/2004 requires that a veterinarian is present on site at an abattoir during operations. As part of their duties the vet performs ante-mortem and post-mortem inspections on animals and has responsibility for ensuring the abattoir operator meets their legal duties on the welfare of animals.

There are 26 abattoirs in Wales, which in total in 2015 slaughtered 3,665,657 cattle, sheep and pigs (red meat animals) and 60,109,484 poultry. The current data shows that 8 of those abattoirs use CCTV to monitor areas where live animals are handled, including the three largest sites and that in 2015 96.6% of the poultry and 89.5% of the red meat animals were killed in abattoirs that have CCTV installed.

In 2015, the welfare data produced by official veterinarians on sites showed that there were 312 reports of animal welfare breaches. Of those, 260 related to transport and were not the responsibility of the abattoir (see below about welfare in transport). Of the 52 incidents reported in abattoirs, the incidents by type were

- **Design** - 4 recorded cases linked to damage and similar matters in lairage.
- **Operational matters** - 20 cases, which included 6 with no water provided, 2 involving dairy cows not milked (both in the same premises) and 4 cases of overcrowding in lairage pens.
- **Handling** - 2 cases: one of an operative standing on an animal to stun and one of rough handling of sheep.
- **Stun/kill** - 25 cases were identified, which included 17 animals being identified with injuries, the data does not clarify if the injuries were obtained before or during transport or in the lairage, and there were 6 cases of equipment failures or non-provision of legally required devices.
- **Bleeding** - 1 case of a sheep not stuck after stunning.

Of the 52 abattoir related cases, the breakdown of incidents in plants with and without CCTV is:

Incident	With CCTV	Without CCTV
Design	3	1
Operational	13	7
Handling	1	1
Stun/Kill	14	11
Bleeding	1	0

In Wales 78% of sheep are slaughtered in 3 premises, all of which have CCTV. The vast bulk of cattle - 96% - are slaughtered in one premises, which has CCTV. Of the 4 poultry slaughterhouses, 97% of poultry are slaughtered in the 2 premises with CCTV.

The role of CCTV in preventing these incidents

Where would CCTV have helped to identify these welfare problems? As noted above, of the 312 cases reported, 260 related to transport, so although recorded at the abattoir, the abattoirs were not culpable. CCTV in the lairage unloading bays could identify cases where on unloading the animal(s) were noted to be injured or found recumbent.

Of the 52 cases involving incidents within the premises, if CCTV were appropriately sited, most of the incidents would be seen, but in an effectively and efficiently run abattoir incidents of animals being left in a pen without water, or design or operational issues should be identified by management and/or the official veterinarian long before they are spotted on CCTV.

We do not support the use of CCTV to identify an effective stun or bleed, or, rather, it is simply not appropriate to use CCTV as the principle means of doing so. At stun and bleeding there are experienced, trained staff who are present and close to the animal, able and required to assess the

signs of an inadequate stun much more efficiently and quickly than anyone watching on CCTV would be. There would be a role for CCTV in these areas for identifying operational issues or re-training requirements.

3. Enforcement at Abattoirs

The Food Standards Agency (FSA) monitors, delivers and enforces the welfare provisions at all abattoirs in Wales on behalf of the Welsh Government. All abattoirs are subject to FSA approval prior to commencing slaughter operations.

The role of the FSA Official Veterinarians, who are present at all times during slaughter operations, includes the monitoring of provisions in place to ensure that animals are spared unnecessary suffering, distress or pain during the slaughter process. Non-stun slaughter methods are subject to further FSA Official Veterinary checks.

4. Farm and Animal Welfare Committee (FAWC) Opinion on CCTV in Slaughterhouses

The Farm Animal Welfare Committee (FAWC) was asked for their opinion on the use of CCTV in abattoirs by the Welsh Government. FAWC is an independent [expert](#) committee established to

- advise Defra and the Welsh and Scottish governments:
 - on the welfare of farmed animals
 - on any legislative or other changes that might be considered to improve standards of animal welfare,
- provide independent scientific support and advice as required by [Article 20 of Council Regulation \(EC\) No.1099/2009](#) (PDF, 906KB, 30 pages) on the protection of animals at the time of killing,
- publish its advice.

FAWC is recognised and respected worldwide for its independent, critical analysis of contemporary welfare issues and has provided the model for similar advisory bodies on animal welfare in other countries.

[Their report](#) in February 2015 considered the subject of CCTV widely and noted that it can be a useful tool:

“49. CCTV offers a range of benefits in slaughterhouses for the observation and recording of real-time processes, for the recording of individual incidents, for contributing information to the auditing of animal welfare, for aiding the verification of slaughterhouse compliance with legislative and assurance or certification requirements and for the training of slaughterhouse staff.

51. CCTV offers the possibility of full-time continuous observation and recording of live animal areas, particularly those where there is a high risk of animal injury or avoidable suffering.

53. CCTV can be an important back-up to physical observation, particularly in those small, confined or high risk areas where physical inspection is limited, for example in a stunning area where there is insufficient room for an observer to see the whole procedure.”

However, they did go on to say,

“62. CCTV cannot act as a substitute for direct oversight by management or veterinarians for the supervision of the conduct and training of operators. For practical reasons this requires proximity to the animal and clinical examination/checks which require the presence of an observer. Nor can it be a universal and uncritical panacea for public and professional concern over the treatment and welfare of farm animals in slaughterhouses.

63. There are four principal limitations to the use of CCTV in slaughterhouses. These are

- the variable technical capabilities and capacities of different CCTV systems and their use;
- the potential for inconsistencies in the analysis of CCTV footage;
- the security and visibility of the CCTV resource; and
- the broader efficacy of CCTV in addressing welfare issues.

66. Consultation suggests that a particular limitation of CCTV is that it is rarely viewed or reviewed in a systematic, consistent and effective manner by the Food Business Operator (FBO) or enforcement agencies. CCTV is only as effective as the viewing or review processes employed. While CCTV footage may be accessed and replayed quickly in response to known and observed incidents, considerable resources, time and training are required to view footage in real time or review large amounts of footage from multiple cameras. The ability of the viewer to assess accurately what they are witnessing is important. They should be trained in observation skills in order to understand the actions of the people and reactions of animals they are observing as well as the interaction with the environment and other non-human factors. Consistent sampling and auditing protocols should be developed and employed for the systematic review of CCTV footage and these too require training and resources.”

When CCTV is discussed, it is often seen as the panacea to all incidences of welfare compromise in abattoirs. Recent events have, unfortunately, demonstrated that that is not the case. FAWC also acknowledged this:

“76. CCTV should not be seen as either a replacement for conventional monitoring, verification, auditing and inspection regimes or a panacea in the face of public concern over specific filmed incidences of animal abuse. CCTV needs to work as an adjunct and accompaniment to physical observation and supervisory presences.

77. Current official controls do not necessarily prevent all animal welfare abuses. Yet as research into other uses of CCTV demonstrates, the presence of CCTV is not necessarily a deterrent against illegal acts, nor does it address the motivation for such acts. We believe that behavioural change is more likely to occur with good training and motivation, or the physical presence of the OV or FBO supervisor who are able to respond immediately to incidences and situations involving animal health and welfare.”

The red meat processing industry, via the British Meat Processors Association and the Association of Independent Meat Suppliers, in November 2015, in response to FAWC's recommendations, issued [a statement](#) supporting the use of CCTV which was agreed with their members.

5. Evidence on the Use of CCTV in Raising Welfare Standards in Abattoirs

In the conclusions in their Opinion, FAWC stated that:

“67. While the absence of operator observation (whether through CCTV or otherwise) has been invoked as one contributory factor to the incidences of animal abuse filmed covertly, there has been no objective scientific study nor did we receive any anecdotal evidence to suggest that the presence of CCTV in slaughterhouses is an active contributor to higher levels of welfare compliance. The FSA survey in 2011 did not identify any difference between welfare compliance in plants with or without CCTV installed.”

There is no evidence that CCTV does contribute to higher levels of welfare compliance. FAWC's comprehensive review of the subject did not lead them to making a recommendation that CCTV became mandatory, though they did see it as a useful tool that abattoirs should be encouraged to adopt and exploit.

The Welsh Government has a principle of making evidence-based legislation. Having considered FAWC's report and looked at the list of welfare incidents recorded over the last year in Welsh abattoirs together with the number of animals already being processed in sites with CCTV, we do not consider there is evidence to justify the mandatory requirement for CCTV in abattoirs in Wales. This is particularly so when set alongside FAWC's assertion that

“68. There are financial costs associated with the installation and the running of CCTV within slaughterhouses, even for plants that are already fully compliant with animal welfare requirements. For smaller plants, these costs may be seen as prohibitive. Few detailed figures were provided to us for these costs, however, a small abattoir did offer that its system had cost approximately £5,000 to install (2013). Cost of installation at Freedom Food compliant plants was reported to be between £3,000 and £10,000 (compliance required by April 2011). It was reported to the Cross Party Group on Animal Welfare in the Scottish Parliament in 2012 that the cost of installing CCTV in a slaughterhouse in Scotland would vary from £6,000 to £25,000, with an annual maintenance cost of around £600. Respondents to the consultation noted that costs of CCTV were falling and image quality was improving.”

6. Small and Micro-Abattoirs

The meat processing sector has increasingly consolidated in recent years, but there are still some small abattoirs operating. Regulation 1099/2009 defines a small abattoir as one slaughtering fewer than 1,000 cattle (or equivalent) or 150,000 birds a year. In Wales there are 8 small abattoirs, which slaughter 0.66% of the total kill throughput. These abattoirs operate in an increasingly tight economy, but they often serve a local market and their personal reputation within that market is key to continuation of business.

Many of these abattoirs are run by a sole worker or are small enough that all points of the processing line and lairage can be seen from one spot. An FSA Official Veterinarian is always present during slaughter operations, there seems little to be gained from installing CCTV.

Example of a Small Abattoir

The abattoir owner slaughters on two days per week (14 hours), on average processing 10 cattle, 100 lambs and 50 pigs. Nearly all of this is contract kill servicing 12 butchers within a 60 mile radius, farmers' market traders, local University catering dept, and private individuals taking back their own stock. He employs two full time staff and an apprentice 5 days per week, the days they are not slaughtering are taken up cutting and packing "private kill" carcasses which can include further processing into sausages and burgers.

It is important to note that abattoirs of this type provide an essential and necessary service for the type of customer that the larger abattoirs would find a nuisance, e.g. on a typical day recently they processed 14 lots of lambs and goats, where the smallest batch was one animal and the largest seven, an average of fewer than three per lot.

If small abattoirs like this ceased to exist then there would be concerns about how legitimately these animals would be slaughtered as the large abattoirs are not set up to deal with small lots or private kills and the travel time for the animals could increase substantially. They also provide employment in rural areas with few employment opportunities.

7. Experience of CCTV by Industry

Large abattoirs who have installed CCTV are positive about the experience. They use it for a range of reasons: animal welfare monitoring, training of personnel, particularly in conjunction with the new WATOK guidelines, unloading monitoring and meeting customer requirements. The benefits they have seen include using CCTV footage within site (in the lairage and at stunning) to confirm good/best practice and at handling points in the lairage to check adherence to WATOK SOPs. The benefits are cited as it being a good training tool, assisting in stock counts, and providing additional plant security.

Its most frequent use, though, is to link welfare issues from transport that are identified at unloading directly to delivery vehicle/hauliers for either them or FSA to follow up with farmers and/or hauliers. Generally, those who have access to the CCTV footage are senior management, the site MD, factory and operations managers, technical manager, the site animal welfare officer and Group-wide animal welfare vets.

The large abattoirs have reported that the cost over the years of installing CCTV has been substantial. The current system in one abattoir was about £18,000. There are also additional yearly rolling maintenance and equipment breakdown costs.

8. Conclusions

- There are a number of controls already in place in Welsh abattoirs, from the permanent presence of an official veterinarian with responsibility for overseeing the correct implementation of welfare measures and a daily recording of any incidents to the requirements of Regulation (EC) 1099/2009 for abattoirs to have standard operating procedures on protecting the welfare of animals at all points of the operation, which are reviewed by the OV and at audit time.
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9. Recommendations

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10. Welfare in Transport

Upon review of the available information, it is noted that welfare of animals during transport to slaughter is an area of concern.

EU and domestic legislation requires farmers and hauliers to be responsible for ensuring that only animals that are fit and healthy are presented for slaughter. Farmers and hauliers are also responsible for the health and welfare of animals during transportation.

The Welfare of Animals (Transport) (Wales) Order 2007 sets out the legislative provisions on the protection of animals during transport. The Welsh Government is working with the enforcement and delivery authorities to consider all available options to deliver and enforce key animal health and welfare requirements during transport. Officials will look to the Wales Animal Health and Welfare Framework Group to work in partnership with the farming industry to reinforce messages on animal health and welfare aligned to strategic outcomes, these being that Wales has healthy and productive animals and that people trust and have confidence in the way food is produced and public health is protected.

Annex 1

Checklist to determine whether CCTV would enhance the management of the welfare of livestock in the slaughterhouse. (It is suggested that the FBO and OV should complete the checklist together.)

Question	Yes	No	Comment
Are livestock always under continuous supervision during unloading?			
Can livestock be quickly and easily observed in the lairage?			
Do you have sufficient manpower to observe the lairage, races, killing area and slaughter line simultaneously?			
Have ZERO welfare incidents occurred or been /recorded on the premises in the past year (how many and where in the premises)?			
Would you be better equipped to identify slaughtermen's training needs from CCTV monitoring of operations?			

A CCTV system is advisable (perhaps only in certain locations or throughout) if you have answered 'NO' to 2 or more of the questions.