

WALES ANIMAL HEALTH AND WELFARE FRAMEWORK GROUP

OPINION AND RECOMMENDATIONS ON THE USE OF CCTV IN SLAUGHTERHOUSES IN WALES

Introduction

The Wales Animal Health and Welfare Framework Group (Wales AHWF Group) is a publically appointed group of 6 experts established to support the implementation of the Wales Animal Health and Welfare Framework. This sets out our plan for continuing and lasting improvements in standards of animal health and welfare for kept animals, whilst also helping to protect public health and making a contribution to the economy and the environment. A key objective of the Wales AHWF is to embed partnership working to develop a robust monitoring and evaluation framework, underpinned by a strong evidence base.

In February, the Wales AHWF Group was asked by Lesley Griffiths AM, Cabinet Secretary for Environment and Rural Affairs to consider the issue of the use of CCTV in slaughterhouses and provide our considered opinion and recommendations on how to progress this issue in Wales. Specifically, we were asked to consider the report and recommendations produced by the “Safeguarding Animal Welfare at Slaughter Task and Finish Group” (Task and Finish Group) along with other evidence including;

- The Farm Animal Welfare Committee Report of 2015
- A response to the task and Finish Group report by Animal Aid
- A response to the Task and Finish Group by Mr David Grimsell.

A copy of the papers considered by the Wales AHWF Group is attached at **Annex 1**.

This paper sets out the opinion of the Wales AHWF Group, including an Overall Summary and Recommendations and opinion on each of the recommendations made in the Task and Finish Group Report.

Overall Summary and Recommendations

It is of paramount importance for Wales to have the highest standards of animal welfare which must be maintained from the farm through to the point of slaughter. This is essential, not only from the perspective of the animal but also to ensure and protect high levels of consumer confidence in Welsh red meat and dairy products.

We recognise the very good evidence presented to support the use of CCTV. As a Group, we support the **aspiration** for there to be CCTV in all abattoirs in Wales. We

considered the Task and Finish Group's interpretation of the statistics presented and even if we adjusted these to interpret them differently, the number of incidences would not have been statistically significant to change our conclusion. Therefore based on the statistics presented concerning the number and type of welfare incidents in abattoirs, and the important role played by smaller abattoirs in parts of Wales (especially for casualty stock), **we agree with the conclusion of the Task and Finish Group** report that **currently** there is not sufficient basis upon which to make CCTV a mandatory requirement in abattoirs in Wales. We also endorse the other recommendations made in the report.

To progress the issue in Wales, we would make the following recommendations for consideration by Welsh Government in partnership with industry stakeholders;

- a. review the membership of the Task and Finish Group so it is best placed to work with Welsh Government on the way forward.
- b. continue the work to develop, promote and implement proposals to encourage the voluntary installation of CCTV – real emphasis on the smaller businesses and the wider link to Farm Assurance Schemes.
- c. linked to (b), refine the checklist referred to within the Task and Finish Group report and promote its use.
- d. undertake a full cost/benefit analysis of the impact of the policy in Wales (mindful of the effect it could have on the smaller businesses)
- e. review the position in relation to the availability of grants to support funding for installing CCTV – cost to smaller businesses appears a key barrier
- f. request further evidence from the task and Finish Group of their contention that “ the welfare of animals during transport to slaughter is an area of concern” and continue the work to gather evidence in relation to welfare of animals during transport and consider linking this to work being undertaken by the Cattle Health and Welfare Group
- g. closely monitor the policy position in England – we note the commitment within the Conservative manifesto for mandatory CCTV
- h. monitor the effectiveness of the voluntary approach and review the situation within 2 years.

Opinion on Recommendations in the Task and Finish Group Report

Recommendation 1: *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.*

The Wales AHWF Group agrees with this recommendation.

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The welfare of animals is of paramount importance from the farm through to the point of slaughter. There is a need to minimise any incidents which compromise animal welfare. The Welfare of Animals at the Time of Killing (Wales) Regulations 2014 already set out the strict rules which must be adhered to including amongst others the requirement for a certified Animal Welfare Officer to be present in every slaughterhouse over a minimum size and the requirement for those outside of a slaughterhouse to hold a Welfare of Animals at the Time of Killing License (WATOK license). As a Group, we believe the best way to ensure the highest of animal welfare standards at time of slaughter is through the presence of vets on site. This must be supported with exemplar training for all staff on the premises handling live animals. CCTV must not be seen to undermine this work but must be viewed only as a tool to support this.

We recognise the very good evidence presented to support the use of CCTV. As a Group, **we support the aspiration for there to be CCTV in all abattoirs in Wales.** We considered the Task and Finish Group's interpretation of the statistics presented and even if we adjusted these to interpret them differently, the number of incidences would not have been statistically significant to change our conclusion. Therefore based on the statistics presented concerning the number and type of welfare incidents in abattoirs, **we agree with the conclusion of the Task and Finish Group report that there is not sufficient basis upon which to make CCTV a mandatory requirement in abattoirs in Wales at this point in time.**

We would recommend effort is focussed on developing, promoting and implementing the voluntary approach. It is crucial this is monitored closely with evidence gathered to inform the policy position specific to Wales. Much of the evidence countering the statistics presented in the Task and Finish Group report focussed on the alleged situation in England (we would ask the question as to whether these incidences were reported through official channels).

We are also mindful of the potential impacts this policy may have on the smaller, often family run businesses (see response to Recommendation 5). We feel more work needs to be done to fully understand the costs and benefits of making CCTV mandatory. This is a piece of work which can be used to inform many of the recommendations proposed in terms of a voluntary approach.

We recommend the effectiveness of the voluntary approach is reviewed within 2 years, and dependent on the outcome, the option of compulsory CCTV reconsidered. Much of the work which would have been undertaken during this time, including any cost/ benefit analyses can be used to inform the legislative process should the decision to take this option be pursued.

Recommendation 2: *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.*

The Wales AHWF Group agrees with this recommendation.

Encouraging the voluntary introduction of CCTV is a big step towards the aspiration of having CCTV in all slaughterhouses. CCTV has the capacity to play a crucial role in demonstrating best practice, improving training and offering welfare assurance over and above simply identifying and evidencing bad welfare practice.

Looking at the evidence provided, all large slaughterhouses in Wales already have CCTV installed. Therefore the majority of animals slaughtered in Wales are already protected in this way. The focus will need to be on encouraging the smaller abattoirs (often family businesses) to install CCTV. As set out in our response to Recommendation 5, we recognise the cost implications associated with installing CCTV for the smaller businesses. A full cost/ benefit analysis will help inform work to encourage the installation of CCTV. We would also recommend linking this work to the wider goal of encouraging sign up to farm assurance schemes.

Recommendation 3: *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.*

The Wales AHWF Group agree with this recommendation

Whilst we are in support of this recommendation, we recognise CCTV may not always pick up all incidences. If CCTV is installed then it is crucial it is not viewed as a replacement to the Food Standards Agency vet but as merely a tool to support this work.

Recommendation 4: *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.*

The Wales AHWF Group agree with this recommendation

We support the promotion and use of the checklist. However, to promote the aspiration for all abattoirs in Wales to install CCTV, we would recommend the checklist is refined to form part of a wider package of information to encourage abattoirs currently without CCTV to understand its benefits, the requirements and costs associated with installing CCTV and how best to use it.

Recommendation 5: *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.*

The Wales AHWF Group agree with this recommendation.

Looking at the existing evidence and drawing on our own experience, it would appear the biggest barrier to installing CCTV for the smaller abattoirs is the associated costs. This can be a costly process in both capital and revenue terms and could potentially increase unit costs to the business disproportionately. These small businesses have always provided an important service to livestock producers within their catchments, including the slaughtering of animals in danger of being exposed to welfare issues if transported a long distance. We would recommend further work is carried out by Welsh Government in partnership with industry to undertake a full cost/ benefit analysis on making CCTV mandatory. This will provide additional evidence upon which to review progress and if agreed, support the legislative process to make having CCTV in slaughterhouses mandatory.

Recommendation 6: *We would like to see additional focus on the improvement of welfare of animals during transport to slaughter.*

The Wales AHWF Group agrees with this recommendation.

Welfare of animals during transport to slaughter is an issue which the Wales AHWF Group has considered previously. A paper was presented to the Group for consideration at our meeting on 14th June 2016. Our view expressed at that time still stands. We recommend more work is required to improve the evidence base around the enforcement of the Welfare of Animals in Transport Legislation and for Welsh Government to work with industry partners to consider animal welfare incidences and evidence gathered from these to inform best practice. We would also flag the work of the GB wide Cattle Health and Welfare Group who at their December meeting considered a paper put forward by Welsh Government on Welfare of Animals in Transport legislation.

Recommendation 7: *This group would be happy to meet twice yearly with Welsh Government officials to discuss welfare of animals during slaughter as appropriate.*

The Wales AHWF Group agrees with this recommendation.

A key principle underpinning the Wales AHWF is working in partnership. We feel it is crucial for Welsh Government and industry partners to continue to work together to discuss the complex topic of welfare of animals at time of slaughter. The recommendations we have also made can be fed into this process. However, we have noted the concerns raised about the membership of the Task and Finish Group. Before embarking on this next phase of work, it may be beneficial to review

the membership of the Group to ensure those with an interest are represented. This will ensure the industry group is best placed to deliver on the recommendations presented and continue the work to build the evidence base underpinning this policy area.