

# BVA Welsh Branch response to Welsh Government's consultation on mandatory closed-circuit television (CCTV) in slaughterhouses

## Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.

## General comments

3. We welcome Welsh Government's proposal to introduce mandatory closed circuit television (CCTV) in all slaughterhouses as an additional safeguarding measure under the Animal Welfare Act 2006. We support the introduction of mandatory CCTV in all areas where live animals are kept, handled, stunned or killed in slaughterhouses, with unrestricted access to CCTV footage for Official Veterinarians (OVs) and other enforcement officers. However, it is important to reiterate that CCTV footage checks are a valuable additional enforcement measure and must not reduce or replace the physical monitoring and verification of animal welfare and meat hygiene requirements that OVs currently undertake.

## Enhanced Animal Welfare Provision

### Support for mandatory requirements for CCTV cameras in slaughterhouses

4. We strongly support mandatory CCTV recording in slaughterhouses in all areas where live animals are present, with unrestricted access to real time and stored footage for Official Veterinarians and other enforcement officers. CCTV is a useful tool in helping to ensure that legal requirements are met and high animal welfare standards are maintained. The introduction of mandatory CCTV in all slaughterhouses will:
  - Increase opportunities to observe and verify handling of animals
  - Increase opportunities to observe and verify conditions during lairage
  - Increase opportunities to observe and verify the proper application of the stun process
  - Increase opportunities to protect the food chain and public health
  - Contribute to increased consumer confidence that Food Business Operators (FBOs) are taking all necessary steps to prioritise, assess and address animal welfare issues
  - Provide a valuable training tool for slaughterhouse staff to promote best practice and compliance with legislative and commercial standards
  - Inform the continuous improvement of slaughter processes and business operations
  - Provide supplementary evidence in response to any allegations of illegal practice

5. CCTV systems should operate to an agreed standard and be maintained by a reputable supplier. The installation of a poorly positioned, low-quality CCTV system, may impede, as opposed to enhance, an OV's ability to monitor and verify compliance with animal welfare requirements. Therefore, in order to be effective, FBOs should be required to install CCTV in a manner that can provide a clear, unobstructed recording of all areas where live animals are unloaded, kept, handled, stunned and killed. Cameras must remain clean and free from dirt and condensation, with a suitable protocol in place to achieve this and provide ease of access to allow repair and upkeep - but not interference - with the cameras. As part of this, all images must be of a suitable quality (number of pixels) and number of frames per second to be admissible as evidence in a court of law. We would welcome further clarification as to what image quality, installation and maintenance requirements/standards proposed legislation will set out.
6. In order to ensure consistent enforcement and compliance of welfare standards, CCTV should be installed in all approved slaughterhouses regardless of size. Given the reduced size of smaller premises, the installation of CCTV systems should require less complex systems, resulting in lesser expenditure for smaller businesses.
7. The 2018 Welsh Government Food Business Investment scheme package of grant aid has been a welcome incentive for small and medium size slaughterhouses to install and upgrade CCTV monitoring systems, and it is encouraging to see that the vast majority of animals being slaughtered are being processed at premises with CCTV. However, the consultation document highlights that six slaughterhouses remain without any CCTV and a further seven would not comply with the requirements in England and Scotland. As these remaining premises have not taken up the voluntary scheme, legislation will be necessary to ensure full compliance.
8. More information is available in the [BVA position on CCTV in slaughterhouses](#) and [BVA position on the welfare of animals at slaughter](#).

### **Benefits to animal welfare from requiring CCTV in all slaughterhouses**

9. The veterinary profession's first responsibility is to advocate for the best interests of animals and ensure as many kept animals as possible have a good life and a humane death. With this in mind, we consider that these proposals, as outlined in the regulatory Impact Assessment, will ensure high animal welfare standards are maintained and enable Official Veterinarians to carry out their role in monitoring and enforcing animal welfare standards more efficiently and effectively, contributing to increased consumer confidence. It will also allow more opportunities to review any situations where issues have arisen, and to learn from these occasions.
10. We consider that all animals should be stunned before slaughter, purely for reasons of animal welfare. However, BVA recognises that for various reasons the stun process is on occasion not carried out as effectively as legislation dictates. Closed Circuit Television cameras (CCTV) are a useful tool in helping to meet animal welfare requirements in slaughterhouses, observing and verifying the handling of animals and the proper application of the stun process. CCTV also has the potential to provide supplementary evidence in response to any allegations of illegal practice as well as helping to protect the food chain and public health.
11. The use of CCTV in slaughterhouses is being promoted by animal welfare organisations and supported by retailers and farm assurance schemes, many of which are increasingly requiring CCTV in the slaughterhouse. Additional options for observing and verifying slaughterhouse activity include an aperture, or window in the stunning pen. However, such options have their limitations as they cannot offer continuous recorded surveillance and often do not provide objective evidence or records.

## Enhanced Animal Welfare Enforcement

### Requirement for slaughterhouse operators to retain CCTV footage for 90 days

12. We would welcome the retention of CCTV footage for 90 days as a reasonable requirement. Such a requirement is in line with legislation in England and Scotland, the [Farm Animal Welfare Committee \(FAWC\) recommendations](#), the requirements of several large retailers and the RSPCA Freedom Foods quality assurance scheme. As FAWC recommends, if there is an indication that footage might be used as evidence in enforcement action, it should also be retained beyond the 90-day period. In addition, to support authorised officers to verify CCTV footage retrospectively, there should be clear protocols in place that outline who is able to monitor the footage and why. Likewise, appropriate training should also be provided for staff involved in reviewing CCTV footage, on how to carry out effective observational techniques and securely store and access recorded material.
13. We understand that the cost of 90 days' storage would be relatively low and so not act as a financial burden to FBOs. Further, the retention of CCTV footage for 90 days would allow for the retrospective viewing of footage for training purposes which would be a useful training tool for both Food Standards Agency (FSA) and slaughterhouse staff, as well as informing overarching FBO business operations to consolidate an unwavering focus on animal welfare throughout slaughterhouse processes.

### Unrestricted access to authorised persons to view (in real time and stored), copy or seize recorded images

14. Unrestricted access for Official Veterinarians and other authorised officers to real time and stored CCTV footage is paramount. The purpose of CCTV in slaughterhouses is fundamentally undermined if vets are refused access to footage and the footage is not monitored independently of the slaughterhouse business operator. Permitting unfettered access to real time and stored CCTV footage enhances OVs' and other enforcement officers' opportunities to monitor and verify compliance with animal welfare requirements retrospectively, and allows for the identification of suspected compromises or breaches of animal welfare for further investigation.
15. However, as the consultation document recognises, the unrestricted viewing of CCTV footage should be seen as an additional management tool to protect animal welfare. CCTV should be used to complement, not reduce or replace, the existing physical presence and controls exercised by OVs in slaughterhouses to assess and maintain compliance with animal welfare standards.
16. It should not be necessary for FBO staff to constantly observe slaughter operations via CCTV in real-time. As previously stated, CCTV footage should be regularly observed and verified according to an agreed protocol. In turn, the review and verification of CCTV footage, both real time and stored, should be fully incorporated into existing Official Veterinarian job roles and responsibilities, with corresponding remuneration for these additional duties.

## Cost to Businesses

### Assessment of the cost of mandatory CCTV

17. BVA believes that for the benefit of animal welfare, all approved slaughterhouse operators must have effective procedures in place to be able to observe and verify stunning and slaughter operations. Appropriate training should be provided on observational techniques, and the use and secure storage of recorded material, for staff involved in reviewing CCTV footage. It is recommended that OVs as well as other enforcement officers must have

access to any CCTV footage and this should be written into UK legislation. This would avoid any delays and complications caused by securing a warrant. Funding for this training should be considered within the overall cost assessment.

### **Are the costs reasonable and proportionate for individual businesses, irrespective of size?**

**18.** We recognise the monetised costs to slaughterhouses to install CCTV, as well as costs to maintain CCTV systems and store footage. However, we believe the extent of non-monetised benefits to a breadth of stakeholders – animals, OV's, slaughterhouse staff, the public and FBOs themselves – justifies any expenditure. Operators have also been provided with the opportunity to benefit from the Welsh Government Food Business Investment scheme package of grant aid in order to reduce their costs.

### **Welsh Language**

**19.** BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities. Our high animal health and animal welfare standards rely on effective communication between vets and food business operators, for example, to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication, and it is important for animal health and welfare that stakeholders in all parts of Wales are able to access schemes and veterinary services in Welsh when that is their chosen first language.