

BVA and BVA Northern Ireland Branch response to the Department of Agriculture, Environment and Rural Affairs (DAERA) consultation on the introduction of mandatory CCTV into slaughterhouses in Northern Ireland

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our mission is to represent, support and champion the whole UK veterinary profession. We are a professional body and our members are individual veterinary surgeons. We take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) BVA Northern Ireland Branch exists to represent members in Northern Ireland. It brings together representatives of our specialist divisions, Government, academic institutions, and research organisations in Northern Ireland.

General comments

- 3) We welcome the opportunity to engage with the Department of Agriculture, Environment and Rural Affairs (DAERA) consultation on the introduction of mandatory CCTV in slaughterhouses in Northern Ireland. We support DAERA's proposals to introduce mandatory closed circuit television (CCTV) in all slaughterhouses. We also support the proposals that will enable Official Veterinarians (OVs) to have unrestricted access to these systems and the resulting footage.
- 4) CCTV footage checks are a valuable additional enforcement measure, however, the deployment of CCTV Systems must not reduce or replace the physical monitoring and verification of animal health and welfare and meat hygiene requirements that OVs currently must statutorily undertake.
- 5) It is important to note that, as the consultation document outlines, the majority of slaughterhouses already use CCTV. However, without legally assured access to these systems and their output for the Official Veterinarian and other authorised bodies, it is possible their value in monitoring animal welfare in these locations may not be fully realised.
- 6) Lastly, for CCTV footage to be useful there needs to be a process in place that allows sufficient time and resources to look at the resulting footage.

Q1. Do you agree CCTV cameras should be installed in all approved slaughterhouses in Northern Ireland in areas where live animals are present, including areas where animals are unloaded, kept, handled, stunned and killed?

- 1) Yes. 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
 - Offer increased opportunities to promote best practice
 - Offer assurance of 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
- 2) 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.
- 3) The mandatory installation of CCTV in slaughterhouses in Northern Ireland would also bring the requirements of slaughter premises in the country in line with the requirements already in force in other parts of the UK, which have already implemented the 2015 FAWC recommendations, as noted in the consultation document. England took forward legislation in 2018, following a public consultation that concluded in 2017; Scotland chose to legislate in 2021; and on 1 June 2024, legislation in Wales came into force.
- 4) Veterinarians on joining the Royal College of Veterinary Surgeons commit that their *"constant endeavour (will be) to ensure the health and welfare of animals committed to (their) care"*, and the wider veterinary profession has a responsibility to advocate for the best interests of animals, and to ensure as many kept animals as possible have a good life and a humane death.
- 5) CCTV is 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.
- 6) We therefore consider that the proposals to install CCTV cameras in all approved slaughterhouses will help ensure high animal welfare standards are maintained and better enable OVs 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 occurrences.

- 7) 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 depend on the physical presence of the OV or slaughterhouse supervisor, and so cannot offer continuous or recorded surveillance and often do not provide objective evidence or records.
- 8) More information is available in the [BVA position on CCTV in slaughterhouses](#) and [BVA position on the welfare of animals at slaughter](#).

Q2. Should CCTV be installed in all approved slaughterhouses, regardless of size?

- 9) Yes. 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. We would welcome further clarification as to the minimum requirements for image quality/resolution, coverage, installation and maintenance that the proposed legislation will set out.

Q3. Do you believe it is reasonable to require slaughterhouses to retain CCTV footage for 90 days?

- 10) 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, Scotland and Wales, 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.
- 11) 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.

Q4. Should there be unfettered access to CCTV footage, both real time and stored, for authorised officers, e.g. Official Veterinarians or DAERA Officers?

- 12) Unfettered access for Official Veterinarians and other authorised officers to real time and

stored CCTV footage is of paramount importance. The purpose of CCTV in slaughterhouses would be fundamentally undermined if OV's were to be refused access to footage, and the footage was not monitored independently of the slaughterhouse business operator. Permitting unfettered access to real time and stored CCTV footage enhances OV's and other enforcement officers' opportunities to monitor and verify compliance with animal welfare requirements in real time and retrospectively and allows for the identification of suspected compromises or breaches of animal welfare for further investigation. The format of the images must be such that they can be shared on an electronic file with the OV, who can then use for further investigation, including enforcement action where necessary. Consideration of file transfer format and compatibility with government systems should be taken into account when considering 'unfettered access'. Legislation should be drafted in such a way that this is included.

- 13) Given the criticality that OV's as well as other enforcement officers have unfettered access to any CCTV footage, BVA believes that this should be written specifically into the proposed NI legislation. This would avoid any delays and complications caused by securing a warrant.
- 14) However, CCTV must only be used to complement, not reduce or replace, the physical presence and controls exercised by OV's in slaughterhouses to assess and maintain compliance with animal welfare standards.
- 15) It should not be necessary for Food Business Operator (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 OV job roles and responsibilities, with corresponding time and remuneration allowed for any increase in time- spend / work-load associated with these additional duties.

Q5. Do you feel that the potential costs of introducing mandatory CCTV in slaughterhouses is reasonable and proportionate for individual businesses irrespective of size?

- 16) We recognise that there will be financial implications for slaughterhouses to install CCTV, as well as costs to maintain CCTV systems and store footage. However, we believe the extent of benefits to a breadth of stakeholders – animals, OV's, slaughterhouse staff, the public and FBOs themselves – justifies any likely expenditure
- 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. As such, it recognises that other costs may arise, as an example, around the training which should be provided in observational techniques, and the use and secure storage of recorded material, for staff involved in reviewing CCTV footage. Funding for this training should be considered within the overall cost assessment.