Mandatory Closed Circuit Television (CCTV) recording in slaughterhouses – a consultation

August 2017

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Part 1 - Introduction

Purpose of this consultation

1. The purpose of this consultation is to seek views on a proposal for mandatory CCTV recording in slaughterhouses for animal welfare purposes.

2. The objective of the proposal is to improve animal welfare in all slaughterhouses and provide assurance that there is effective monitoring and verification of animal welfare standards in all slaughterhouses.

Scope

3. The Government has a manifesto commitment to make CCTV recording in slaughterhouses mandatory. The proposal for reform outlined in this consultation relates to the mandatory installation and operation of CCTV equipment in all areas of approved slaughterhouses where live animals are present, e.g. where they are unloaded, kept, handled, stunned and killed; and for authorised officers, e.g. Official Veterinarians of the Food Standards Agency, to have unfettered access to these facilities for the purpose of monitoring and verifying of animal welfare standards in the slaughterhouse.

4. The proposal outlined in this consultation relates solely to England as animal welfare policy is devolved.

Audience

5. Anyone may respond to the consultation. Defra would particularly like to hear from organisations and individuals involved in and concerned with the slaughter of animals. Campaigns resulting in stock responses will be recorded but may not be individually acknowledged.

Those who have an interest include:
Trade representatives in the livestock and meat industries
Animal welfare organisations
Animal welfare enforcement bodies
The veterinary profession
The Farm Animal Welfare Committee
Farm assurance schemes
Retailers
Responding to the consultation

6. This consultation started on 11 August 2017 and closes on 21 September 2017. We would prefer you to respond to the consultation questions using the online survey which can be found on Citizen Space at https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses. However, responses can be sent to the Animal Welfare Team by email or post.

| Q1 | Your name. |
| Q2 | Your e-mail address. |
| Q3 | Your organisation. |

Enquiries and responses should be directed to:

E-mail: animalwelfare.consultations@defra.gsi.gov.uk

or

The Animal Welfare Team
Area 5B, Nobel House
17 Smith Square
London SW1P 3JR

If you would like to receive hard copies of the consultation documents, you may contact the Animal Welfare Team at the above email address.

After the consultation

7. Members of the public may ask for a copy of the responses under Freedom of Information legislation. If you do not want your response - including your name, contact details and any other personal information - to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer that will not count as a confidentiality request. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under Freedom of Information legislation. However, because of the law, we cannot promise that we will always be able to keep those details confidential.

8. We will summarise all responses and place this summary on our website at: https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses.

9. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

10. This consultation is in line with the Government’s Consultation Principles. Please note that a consultation period of 6 weeks applies. More information on the Government’s Consultation Principles can be found at:

Part 2 – Consultation

Background

11. There are strict rules for the protection of animals at slaughter contained in EU and domestic legislation.

12. Council Regulation 1099/2009, on the protection of animals at the time of killing, applies to all animals bred and kept for the production of food, as well as other products. In England, the Welfare of Animals at Time of Killing Regulations 2015 provides the powers to enforce the EU regulation fully and retains our longstanding stricter national rules which give greater protection than the EU regulation\(^1\).

13. Legislation is aimed specifically at preventing cruelty or poor practice in slaughterhouses or other places where animals are slaughtered or may have to be killed. Regulations set down specific requirements which must be complied with at all stages of the slaughter or killing process. The regulations make it an offence to cause any animal avoidable pain, distress or suffering.

14. Food Business Operators are primarily responsible for the welfare of animals in their premises. Official Veterinarians of the Food Standards Agency monitor and enforce the welfare regulations in all approved slaughterhouses to ensure that animals are spared avoidable pain, distress or suffering during the slaughter process. The Food Standards Agency approves slaughterhouses in line with EU Regulations (EC) No. 852/2004 and 853/2004.

15. Our proposal would introduce mandatory CCTV recording in all slaughterhouses as an additional enforcement measure under the Animal Welfare Act 2006, in line with the Government’s manifesto commitment to make CCTV recording in slaughterhouses mandatory.


17. CCTV was identified as offering real benefits in slaughterhouses as an important complement to official physical observation and verification of slaughterhouse practices and effectively recording animal welfare abuses. FAWC recommended that all approved slaughterhouse operators should install CCTV in all areas where live animals are kept and where animals are stunned and killed. FAWC also recommended that CCTV cameras should be installed so as to permit a clear and uninterrupted view of the processes being recorded at all times; that CCTV footage should be accessible to and viewed on a regular basis by Food Business Operator staff, Animal Welfare Officers and Official Veterinarians to ensure business compliance, particularly in those areas and for those processes where the risk of non-

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\(^1\) In June 2016, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period the Government will continue to negotiate, implement and apply EU legislation. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation in future once the UK has left the EU.
compliance is higher; and that CCTV footage should be retained by the slaughterhouse for a period of three months and be available to authorised officers.

18. FAWC stated that CCTV should not replace, reduce or be considered a substitute for current controls of slaughterhouse practice undertaken by Official Veterinarians, Animal Welfare Officers, slaughter operators and others. FAWC recognised its additive value towards protecting animal welfare and benefiting the plant operator’s business.

19. FAWC identified many benefits of CCTV to the Food Business Operator which include:

- providing evidence of due diligence and compliance with legislative and commercial standards and responsiveness to consumer concerns increasing public trust;
- contributing to Food Business Operator reviews of effectiveness of operations (including improving handling and reducing stress in animals) and enable the Food Business Operator to make improvements to processes and operating instructions;
- providing a valuable training tool for slaughterhouse staff;
- encouraging collective responsibility in slaughterhouse staff;
- providing evidence for disciplinary action; and
- enabling disputes to be resolved including relating to spurious allegations.

20. Following publication of the FAWC report, two industry bodies – the British Meat Processors Association and the Association of Independent Meat Suppliers – published a protocol for the industry on the use of CCTV in slaughterhouses (November 2015). This drew heavily on FAWC’s recommendations.

21. Some recent cases of animal abuse at slaughterhouses have been brought to light through covert filming made available to the Food Standards Agency by animal welfare NGOs. These cases have increased the calls from animal welfare NGOs (e.g. RSPCA, Compassion in World Farming, World Horse Welfare) and veterinary organisations (e.g. British Veterinary Association) for mandatory CCTV in slaughterhouses for animal welfare purposes. There have also been calls for unfettered access for Official Veterinarians to CCTV footage where CCTV is installed. In May 2017 FSA agreed a protocol with industry on limited access to live CCTV feeds.

22. Recently there has been a Parliamentary debate on CCTV in equine slaughterhouses. In January 2017 the French Assembly voted for the compulsory installation of CCTV in all slaughterhouses - if approved by the senate this will come into force in January 2018. This follows exposes of animal welfare abuses in French slaughterhouses.

**Issue being addressed**

23. CCTV has been identified as offering real benefits as an important complement to physical observation and verification of slaughterhouse practices (FAWC report 2015).

24. In 2012 the Government consulted on introducing mandatory CCTV in slaughterhouses as part of its consultation on the Welfare of Animals at the Time of Killing Regulations and decided to maintain a voluntary approach for the time being. From 2011 to 2013 there was an increase in CCTV uptake but from 2013 until now there has been little further uptake. In 2013 around 43% of red meat slaughterhouses and around 55% of poultry slaughterhouses had CCTV installed for animal welfare purposes. In 2015 this had risen to around 49% of red meat slaughterhouses and to around 71% of poultry slaughterhouses.
25. Voluntary uptake of CCTV is by no means universal nor comprehensive in providing for monitoring and verification of compliance with animal welfare requirements. While voluntary uptake of CCTV in slaughterhouses has increased with the majority of animal throughput covered, the increase in CCTV uptake has stalled with only around 50% of red meat slaughterhouses and around 70% of poultry slaughterhouses having adopted CCTV for animal welfare purposes by 2016. (The latest survey of CCTV in slaughterhouses in England and Wales was conducted in 2016 by the Food Standards Agency: [https://www.food.gov.uk/news-updates/news/2016/15460/results-of-cctv-survey-in-slaughterhouses-published](https://www.food.gov.uk/news-updates/news/2016/15460/results-of-cctv-survey-in-slaughterhouses-published)).

26. While the majority of animals are slaughtered in plants that have, to some extent, installed CCTV for animal welfare purposes, there are still significant numbers that have no such protection. Given the large numbers of animals killed per year, 1% of poultry killed in the UK in plants without CCTV still equates to around 9 million birds. The same applies to other species: 8% of cattle equates to around 200,000 cattle; 4% of pigs equates to around 400,000 pigs; and 12% of sheep equates to more than 1.5 million sheep that are killed in premises without CCTV (Food Standards Agency CCTV Survey 2016).

27. Wherever live animals are kept in slaughterhouses animal welfare could be compromised. Slaughterhouses that have installed CCTV have not done so in a comprehensive manner. In 2016 the percentage of slaughterhouses with CCTV in particular locations were: unloading 46%; lairage 43%; race and restraint 37%; stun area 37%; and bleed area 38% (Food Standards Agency CCTV Survey 2016). This means that even in slaughterhouses where CCTV is installed key areas of welfare risk are not currently covered by cameras.

28. Official Veterinarians can currently seize CCTV footage if they suspect a breach of the regulations. Unfettered access for authorised officers, such as Official Veterinarians, at all times would provide more opportunities to assess compliance with the regulations on a proactive and reactive basis. Almost one fifth (around 18%) of abattoirs with CCTV have also said they would not allow unfettered access to CCTV footage for Official Veterinarians of the Food Standards Agency.

29. CCTV can enable official observation and verification of animal welfare incidents, and can contribute to the auditing of animal welfare and the verification of slaughterhouse compliance with legislation. CCTV offers authenticity and transparency and can be retained for future review or for evidential purposes.

30. CCTV can also enable the Food Business Operator or Official Veterinarian access to monitor activity in hard-to-see areas such as the stunning area or within gas stunning systems.

31. There have been problems with compliance and enforcement where Official Veterinarians of the Food Standards Agency are not present at the time and place when offences have taken place. The Official Veterinarian is responsible for monitoring the Food Business Operator’s compliance with animal welfare and meat hygiene requirements and cannot be present at all parts of the process at all times.

**Proposal**

32. The policy objective is to maintain and improve animal welfare standards in all approved slaughterhouses and provide assurance that this is the case. A related objective is to ensure that Food Standards Agency Official Veterinarians operate as effectively and as
efficiently as possible, by providing them in the best way with the information they need to do
their jobs.

33. Mandatory CCTV recording should improve the efficiency of monitoring and
enforcement activity, by providing Official Veterinarians with the information they need more
readily and more conveniently – mandatory CCTV recording addresses an information
asymmetry which exists between the regulator and the regulated. As a result of enhanced
Official Veterinarian capability and of any behavioural change on the part of slaughterhouses,
mandatory CCTV recording should lead to improved compliance by the sector, which may
support improved public confidence and improved consumer confidence that welfare
standards are being delivered. Slaughterhouses create negative impacts on other
slaughterhouses when they abuse animal welfare and when this generates wider adverse
reputational costs applying to the whole sector including the compliant majority.

34. Enhanced enforcement would require CCTV cameras to be installed and recording in
all approved slaughterhouses in areas where live animals are unloaded, kept, handled,
stunned and killed. The footage would need to be stored for 90 days, in line with FAWC’s
recommendation.

35. It is proposed that access to view live and stored footage should be given for
authorised officers. This would enable authorised officers to check samples of CCTV footage
both in real time and retrospectively, which broadens their monitoring options. CCTV footage
will also allow verification of alleged breaches of animal welfare rules and have evidential
status.

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

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.

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.

Legal status

36. There is currently no domestic or European legislation that requires CCTV for
monitoring or verification of animal welfare in slaughterhouses.

37. Mandatory CCTV recording in all slaughterhouses as an enforcement measure could
be required through an affirmative statutory instrument under the Animal Welfare Act 2006.
This would ensure the benefits of CCTV to official controls are available in all approved
slaughterhouses and that all areas of significant welfare risk are covered. The Food
Standards Agency monitors and enforces animal welfare regulations in slaughterhouses in line
with a hierarchy of sanctions, ranging from verbal and written advice through to reporting
offences for prosecution. Penalties under the proposed secondary legislation would be
proportionately applied by the Food Standards Agency and limited by the requirements of the Animal Welfare Act 2006.

38. The Food Standards Agency would make use of CCTV as part of their existing enforcement role in the slaughterhouse. The same level of Official Veterinarian resource would be involved as now but would sometimes be engaged in different activities.

**Cost of proposal**

39. An internal Impact Assessment (IA) has been prepared to outline the possible costs and benefits of the proposed reforms and is being made available to view alongside this consultation at [https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses](https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses). We estimate 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.

40. The IA has assessed the costs of installation and maintenance of CCTV systems as well as the cost of storage of CCTV footage. This assessment has been based on limited information on costs and we would welcome information on this.

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.

41. We are aware there are several large companies that run slaughterhouses in the red meat and poultry sectors but data from public records shows that between 50 and 75% of slaughterhouses are small or micro businesses. Many of these small businesses already have CCTV. However, Government needs to be proportionate and fully assess the impact on smaller businesses of requiring CCTV to be installed. As such we are seeking views on this as part of this consultation.

42. Smaller premises should be able to meet the proposed requirements with a less extensive CCTV system than larger premises, thus limiting costs. We recognise that the financial impact on small businesses may still be considered a burden, however, we do believe that exempting small businesses from the regulation would undermine the effectiveness of the policy objectives.

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

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

43. The Government is committed to improved standards of animal welfare at slaughter.

44. Benefits of CCTV in slaughterhouses for animal welfare can be realised through voluntary or mandatory routes, however, the mandatory option will provide full coverage of live animal areas in all slaughterhouses protecting all animals.

45. One of the primary benefits of CCTV is considered to be improved compliance with animal welfare at slaughter requirements, resulting from the deterrent effect of CCTV combined with the enhanced ability of the Food Standards Agency to take enforcement action.

46. While there is limited evidence available on the deterrent effect specifically of CCTV in slaughterhouses there is evidence from other contexts (e.g. the use of speed cameras have been demonstrated to reduce speeding and CCTV to reduce theft of and from vehicles).

47. Animal welfare benefits can flow from the fact that CCTV can observe and record real-time slaughterhouse processes, record individual events and contribute information to the auditing of animal welfare. Detection of animal welfare breaches can result in: a) consequences that act as a deterrent to further poor practice; and/or b) feedback and continuous improvement to slaughterhouse practices. Recordings can also aid the verification of slaughterhouse compliance with legislative requirements. CCTV footage can have authenticity and transparency as evidence and can be retained for long periods. It can enable the Official Veterinarians to observe live animals in high welfare risk areas as well as those that are inaccessible or dangerous to people. Ante-mortem inspection via CCTV can detect unguarded behaviours that might be hidden from human observers, e.g. lameness in sheep.

Q12. Have we identified the main potential animal welfare gains from CCTV in slaughterhouses? Please give any other potential animal welfare gains.
## Annex 1 – Summary of consultation questions

<table>
<thead>
<tr>
<th>Q1</th>
<th>Your name.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q2</td>
<td>Your e-mail address.</td>
</tr>
<tr>
<td>Q3</td>
<td>Your organisation.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q4</th>
<th>Should there be mandatory CCTV recording in all approved slaughterhouses in areas where live animals are present? Please give reasons for your response.</th>
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</thead>
<tbody>
<tr>
<td>Q5</td>
<td>Is it reasonable to require Food Business Operators to retain CCTV footage for 90 days? Please give reasons for your response.</td>
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<td>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.</td>
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</tr>
</tbody>
</table>
Title: Improving animal welfare: Closed Circuit Television (CCTV) in Slaughterhouses.

IA No: INTERNAL IMPACT ASSESSMENT – LOW BUSINESS BURDEN

RPC Reference No:
Lead department or agency: Defra
Other departments or agencies: Food Standards Agency

Summary: Intervention and Options

<table>
<thead>
<tr>
<th>Cost of Preferred (or more likely) Option</th>
<th>RPC Opinion: RPC Opinion Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Net Present Value</td>
<td>Business Net Present Value</td>
</tr>
<tr>
<td>N/A</td>
<td>-£2.63m</td>
</tr>
</tbody>
</table>

What is the problem under consideration? Why is government intervention necessary?

There is scope to improve the effectiveness and efficiency of the monitoring and enforcement of animal welfare requirements in slaughterhouses, as shown by recent breaches. CCTV can provide an important complement to existing arrangements, which are implemented by the FSA. Voluntary uptake of CCTV by the meat industry is currently not comprehensive, in terms of the number of slaughterhouses covered, the areas where CCTV is present, and the access provided to CCTV footage to the FSA.

What are the policy objectives and the intended effects?

The Government has a manifesto commitment to make CCTV recording in slaughterhouses mandatory. The policy objective and intended effects are to improve animal welfare in slaughterhouses and provide assurance that all slaughterhouses are operating to high welfare standards. These will be achieved by the mandatory installation of CCTV in all approved slaughterhouses in areas where live animals are unloaded, kept, handled, stunned and killed, with the FSA having access to CCTV footage, the Food Business Operator (FBO) being required to store footage for a specified period, and footage being available for auditing purposes and having evidential status.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

A voluntary approach has been adopted to date, recent breaches show that improvements are needed. Whilst the voluntary uptake of CCTV in slaughterhouses has increased over the last 6 years, it has now plateaued and only around 50% of red meat slaughterhouses and around 70% of poultry slaughterhouses have CCTV for animal welfare purposes. Where CCTV has been installed it is often not in all areas where live animals are kept (in 2016 the percentage of slaughterhouses with CCTV in particular locations were: unloading 46%; lairage 43%; race and restraint 37%; stun area 37%; and bleed area 38%. FSA 2016). The FSA are currently provided with access to CCTV coverage only where they have a suspicion of possible non-compliance rather than in a more unfettered way.

Will the policy be reviewed? It will be reviewed. If applicable, set review date: Month/Year

| Does implementation go beyond minimum EU requirements? | N/A |
| Are any of these organisations in scope? | Micro Yes | Small Yes | Medium Yes | Large Yes |
| What is the CO₂ equivalent change in greenhouse gas emissions? (Million tonnes CO₂ equivalent) | Traded: | Non-traded: |

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: ______________________ Date: _________________
### Summary: Analysis & Evidence

**Policy Option 1**

**Description:** Compulsory CCTV in slaughterhouses with retention for 90 days and unfettered access for authorised officers

#### FULL ECONOMIC ASSESSMENT

<table>
<thead>
<tr>
<th>Price Base Year</th>
<th>PV Base Year</th>
<th>Time Period Years</th>
<th>10</th>
<th>Net Benefit (Present Value (PV)) (£m)</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Low: Optional</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>High: Optional</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Best Estimate:</td>
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</table>

#### COSTS (£m)

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<tr>
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<th>Total Transition (Constant Price)</th>
<th>Average Annual (excl. Transition) (Constant Price)</th>
<th>Total Cost (Present Value)</th>
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<tbody>
<tr>
<td>Low</td>
<td>Optional</td>
<td>Optional</td>
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</tr>
<tr>
<td>High</td>
<td>Optional</td>
<td>Optional</td>
<td>Optional</td>
</tr>
<tr>
<td>Best Estimate</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Description and scale of key monetised costs by ‘main affected groups’**

Direct costs to slaughterhouses from the more widespread installation of CCTV: One-off costs of around £650,000 plus ongoing costs of around £260,000 per year. Ongoing costs include maintenance and storage of footage.

**Other key non-monetised costs by ‘main affected groups’**

Indirect costs to non-compliant slaughterhouses from achieving better compliance, for example training costs and costs of staff recruitment and replacement.

#### BENEFITS (£m)

<table>
<thead>
<tr>
<th></th>
<th>Total Transition (Constant Price)</th>
<th>Average Annual (excl. Transition) (Constant Price)</th>
<th>Total Benefit (Present Value)</th>
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<tbody>
<tr>
<td>Low</td>
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<tr>
<td>High</td>
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<td>Optional</td>
</tr>
<tr>
<td>Best Estimate</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**Description and scale of key monetised benefits by ‘main affected groups’**

The benefits are not quantifiable sufficiently accurately.

**Other key non-monetised benefits by ‘main affected groups’**

Benefits to the public from improved animal welfare from the deterrent and preventive effects of CCTV. Benefits to slaughterhouses from improved consumer confidence that welfare standards are being met. Benefits to slaughterhouses from CCTV supporting improvements in business operations.

<table>
<thead>
<tr>
<th>Key assumptions/sensitivities/risks</th>
<th>Discount rate (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assume a neutral impact on FSA enforcement action; the FSA’s ability to detect more breaches and to take enforcement action more quickly and easily is balanced by improved slaughterhouse compliance and by fewer breaches occurring.</td>
<td>3.5</td>
</tr>
<tr>
<td>Assume the number of slaughterhouses installing CCTV voluntarily has now reached a stable figure.</td>
<td></td>
</tr>
<tr>
<td>Assume that costs of the technology for CCTV will not change significantly over the next ten years.</td>
<td></td>
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#### BUSINESS ASSESSMENT (Option 1)

<table>
<thead>
<tr>
<th>Direct impact on business (Equivalent Annual) (£m):</th>
<th>Score for Business Impact Target (qualifying provisions only): £1.5m</th>
</tr>
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<tbody>
<tr>
<td>Costs: £0.3m</td>
<td></td>
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<tr>
<td>Benefits: £0m</td>
<td></td>
</tr>
<tr>
<td>Net: £0.3m</td>
<td></td>
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</tbody>
</table>
Evidence Base (for summary sheets)

Given the low direct business costs of these proposals an Internal Impact Assessment has been produced. A full Final Impact Assessment will be produced post consultation.

Problem under consideration

1. Rules for the protection of animals at slaughter are contained in EU and domestic legislation. Legislation is aimed specifically at preventing cruelty or poor practice in slaughterhouses and it sets down specific requirements which must be complied with at all stages of the slaughter or killing process. The regulations make it an offence to cause any animal avoidable pain, distress or suffering.

2. Food Business Operators (FBOs) are primarily responsible for the welfare of animals in their premises. Official Veterinarians (OVs) of the Food Standards Agency (FSA) monitor and enforce the welfare regulations in all approved slaughterhouses to ensure that animals do not experience avoidable pain, distress or suffering during the slaughter process. OVs will take appropriate enforcement action when animal welfare incidents occur. However, OVs cannot be present at all parts of the slaughter process at all times and CCTV can help address this. In addition CCTV can provide the FBO and/or OV with a better view of hard to see areas such as the stunning area or within gas stunning systems.

3. In some recent cases of animal abuse at slaughterhouses where CCTV was not present, enforcement action would not have been possible without the covert filming made available to the FSA by animal welfare NGOs. These kinds of case have increased calls from animal welfare NGOs (e.g. RSPCA, Compassion in World Farming, World Horse Welfare) and veterinary organisations (e.g. British Veterinary Association) for mandatory CCTV in slaughterhouses for animal welfare purposes. These organisations also consider that mandatory CCTV would improve public confidence in the sector.

4. More than 10,000 people have signed government petitions calling for mandatory CCTV in slaughterhouses (GOV.UK e-petitions). It has been noted in Parliamentary debates that equine owners, for whom the slaughterhouse can be a cost effective method of disposal for some horses, can be unwilling to use slaughterhouses without assurance of a good death for their animal (Hansard, 29 November 2016).

5. Voluntary uptake of CCTV by slaughterhouses is currently not universal nor comprehensive in providing for monitoring and verification of compliance with animal welfare requirements (See Table 1, FSA Survey data).

6. OVs currently have power to seize CCTV footage where a breach of the regulations is suspected, but OVs cannot routinely view CCTV footage in an unfettered way. There are calls by some stakeholders for authorised officers such as OVs to have unfettered access to CCTV footage. Almost one fifth (18%) of slaughterhouses have said they would not allow unfettered access to CCTV footage for OVs of the FSA.


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Rationale for intervention

8. Mandatory CCTV should improve the efficiency of monitoring and enforcement activity, by providing OVs with the information they need more readily and more conveniently – mandatory CCTV addresses an information asymmetry which exists between the regulator and the regulated. As a result of enhanced OV capability and of any behavioural change on the part of slaughterhouses, mandatory CCTV should lead to improved compliance by the sector, which may support improved public confidence and improved consumer confidence that welfare standards are being delivered. Slaughterhouses create a negative externality on other slaughterhouses when they abuse animal welfare and when this generates wider adverse reputational costs applying to the whole sector including the compliant majority.

9. The Farm Animal Welfare Committee (FAWC) was commissioned by GB Governments to produce an independent assessment of the benefits of CCTV in slaughterhouses. Their report was published in February 2015. CCTV was identified as offering tangible benefits in slaughterhouses as an important complement to official physical observation, including in terms of verifying slaughterhouse practices and effectively recording animal welfare abuses. FAWC recommended that all approved slaughterhouse operators should install CCTV in all areas where live animals are kept and where animals are stunned and killed\(^2\). FAWC also identified benefits to the business from CCTV installation.

10. Voluntary uptake of CCTV in slaughterhouses has now plateaued with only around 50% of red meat slaughterhouses and around 70% of poultry slaughterhouses having adopted CCTV in some areas for animal welfare purposes (FSA CCTV Survey 2016). Those slaughterhouses that have installed CCTV tend to be those ones that are part of an industry assurance scheme and/or are supplying one of the major retailers where CCTV is often demanded as part of meeting the retailer’s specification.

11. The move by many larger slaughterhouses to install CCTV has helped ensure that the majority of animals are now slaughtered in plants that have CCTV installed for animal welfare purposes. Nonetheless, there are still significant numbers of animals that have no such protection and are slaughtered in premises without CCTV in England (FSA CCTV Survey 2016):
   - 1% of poultry, equating to around 9,000,000 birds per year;
   - 8% of cattle, equating to around 200,000 head of cattle per year;
   - 4% of pigs, equating to around 400,000 pigs per year; and
   - 12% of sheep, equating to around 1,500,000 sheep per year.

12. The FSA survey shows that for those slaughterhouses that have installed CCTV, coverage of live animals is not comprehensive with many premises not having cameras in all areas where live animals are kept and where animal welfare could be compromised. In 2016 the percentage of slaughterhouses with CCTV in particular locations were: unloading 46%; lairage 43%; race and restraint 37%; stun area 37%; and bleed area 38% (FSA 2016 survey).

Table 1. Locations of CCTV in slaughterhouses in England and Wales 2016, broken down by red and white meat slaughterhouses:

<table>
<thead>
<tr>
<th>Type of slaughterhouse</th>
<th>Unloading</th>
<th>Lairage</th>
<th>Race &amp; Restraint</th>
<th>Stun area</th>
<th>Bleed area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Red meat</td>
<td>42%</td>
<td>39%</td>
<td>34%</td>
<td>37%</td>
<td>32%</td>
</tr>
<tr>
<td>White meat</td>
<td>56%</td>
<td>55%</td>
<td>44%</td>
<td>38%</td>
<td>52%</td>
</tr>
</tbody>
</table>

13. CCTV can enable official observation and verification of animal welfare incidents, and can contribute to auditing and verification of slaughterhouse compliance with the legislation. CCTV offers authenticity and transparency and can be retained for future review and/or for evidential purposes.

14. OVs can currently seize CCTV footage if they suspect a breach of the regulations. Unfettered access for OVs at all times would provide more opportunities to assess compliance with the regulations on a proactive and reactive basis. Increased CCTV coverage combined with improved access to CCTV footage may also lead to behavioural change in some slaughterhouses, in particular to improved practices and to better compliance.

Policy objective

15. The primary policy objective is to maintain and improve animal welfare standards in all slaughterhouses and provide assurance that this is the case. A related objective is to ensure that FSA OVs operate as effectively and as efficiently as possible, by providing them in the best way with the information they need to do their jobs.

16. The proposed regulation would require all slaughterhouses to install CCTV in all areas where live animals are present, e.g. where they are unloaded, kept, handled, stunned and killed; and would provide that authorised staff of the FSA would have routine access to CCTV coverage. The Food Business Operator would be required to store CCTV footage for 90 days, in line with FAWC recommendations.

Description of options considered (including status-quo)

17. In 2012 the Government consulted on introducing mandatory CCTV in slaughterhouses as part of its consultation on the Welfare of Animals at the Time of Killing Regulations and decided to maintain a voluntary approach for the time being. From 2011 to 2013 there was an increase in CCTV uptake but from 2013 until now there has been little further uptake.

18. The voluntary option (status quo) was supported by the Government and has failed to provide universal adoption of CCTV for animal welfare purposes. Where CCTV has been installed its coverage has not been comprehensive, leaving areas of key welfare vulnerability without real time, objective observation and recording (see table 1). Access to CCTV coverage has not been unfettered.

19. Defra lawyers have advised that it should be possible to make provision for mandatory CCTV in all slaughterhouses through an affirmative statutory instrument under the Animal Welfare Act 2006. This is the preferred option and as part of this, OVs would have access to CCTV footage to improve their enforcement ability. This preferred option would be treated as an enforcement measure to ensure compliance with the direct requirements of the EU legislation. As such this would fall under the province of the competent authority of the Member State, rather than taking the form of a new national rule that would require notification to the EU Commission.
Monetised and non-monetised costs and benefits of each option (including admin burden)

Costs

Costs to slaughterhouses

20. The following direct costs may fall to the slaughterhouse industry in aggregate. These figures should be viewed as initial illustrative estimations. They aim to provide an estimated order of magnitude. The consultation exercise will seek to obtain more evidence on the size and nature of these costs.

One-off direct costs

21. We estimate the total capital cost of new CCTV installation may be around £650,000 across the sector. For slaughterhouses with no CCTV at present we have assumed an estimated one-off cost of around £2,500 (in relation to 20 poultry slaughterhouses plus 92 red meat slaughterhouses, totalling around £280,000). For slaughterhouses with partial CCTV coverage at present we have assumed an estimated one-off cost of around £500 per additional area without coverage now (172 additional areas for poultry slaughterhouses plus 574 additional areas for red meat slaughterhouses, totalling around £370,000). We may assume that CCTV equipment has a 10 year life span.

Ongoing direct costs

22. We estimate the cost of daily oversight and maintenance of CCTV to be around £210,000. This is based on: an assumption that it takes on average 30 mins/day to check and amend CCTV cameras; FSA data on the operating hours of slaughterhouses; hourly pay data for those involved in the processing and preserving of meat (Annual Survey of Hours and Earnings 2016). 30% is added to cover costs like employer NI contribution, pension contribution, holiday pay etc.

23. In addition annual maintenance costs are estimated to be around £30,000 based on assumed annual service charge of 5% of the initial capital value of the additional CCTV equipment (i.e. 5% of around £650,000).

24. We estimate that storage costs for CCTV footage may be around £10,000. This is based on a maximum estimated annual cost of £25 per year/slaughterhouse for those without any CCTV in place currently and an additional £10 per year/area for those slaughterhouses where current CCTV coverage is partial. This is calculated on the basis that 90 days of CCTV footage from 5 cameras would require approximately 2TB of storage.

25. We estimate that other ongoing operating costs such as electricity are likely to be minimal, for example up to around £10,000 per year.

26. In summary we estimate that the total direct ongoing costs to slaughterhouses may be around £260,000 per year.

One-off and ongoing indirect costs

27. As a result of more comprehensive and more accessible CCTV coverage, we expect there would be behavioural change on the part of slaughterhouses which are not currently fully compliant with existing requirements. We do not expect this to apply in relation to slaughterhouses which are currently fully compliant. In particular we consider that there should be an improvement in slaughterhouses practices, leading to better compliance, i.e. that these CCTV reforms should have a preventive and deterrent effect. This may be associated with both one-off costs and with ongoing costs. This may include costs of staff training and staff recruitment and replacement. There may also be costs in terms
of the throughput of animals. Some of these improved practices may also generate business benefits (see benefits section).

28. Slaughterhouses which are not fully compliant may incur other costs associated with changes in FSA enforcement activity. For example more comprehensive and more accessible CCTV coverage may make it quicker and easier for the FSA to issue enforcement notices and/or to support prosecutions. Whether there is an overall increase in enforcement notices and in prosecutions will depend upon how this balances out relative to improved slaughterhouse compliance resulting from the preventive and deterrent effect of CCTV. Our current assumption is that there will be no net increase in FSA enforcement activity.

Costs to the FSA

29. We anticipate that more comprehensive and accessible CCTV coverage would mean that FSA OVs will spend more of their routine inspection time looking at CCTV footage. However, given the role of CCTV in facilitating and improving the efficiency of inspection and of enforcement we consider that the same level of OV resource will be required in future but that OVs may be engaged in different activities. This will also depend upon the behavioural response of slaughterhouses. For example, whilst CCTV may present OVs with more information in a more accessible way, and may lead to a greater number of breaches being identified, CCTV may also lead to slaughterhouses improving their compliance performance and to fewer breaches occurring. In terms of the mix of OV activities, CCTV may possibly result in a greater number of welfare notices if all else remains equal, but CCTV should reduce the resourcing costs associated with making a judgement on the need for, and subsequently supporting, successful prosecutions. FSA costs are covered largely by industry charges and also by other parts of government, e.g. by Defra.

Costs to other parts of the Government

30. Costs to the Government, including to Defra, the Crown Prosecution Service, and the Ministry of Justice, are assumed to remain broadly neutral, on the understanding that the FSA will be engaged in the same level of enforcement activity as now. As mentioned, whilst CCTV may lead to more breaches being detected and more action being taken, it should also lead to improved compliance and to fewer breaches arising.

Benefits

Benefits to the public

31. One of the primary benefits of CCTV is assumed to be improved compliance with animal welfare at slaughter requirements, resulting from the deterrent effect of CCTV combined with the enhanced ability of the FSA to take enforcement action. There is evidence from other contexts on the effectiveness of CCTV as a deterrent (e.g. the use of speed cameras and of security cameras).

32. Surveys consistently show that the public believe farm animal welfare is important: e.g. more than a third of UK respondents (39%) answered “yes, certainly” when asked whether the welfare of farm animals in the UK should be better protected than it is now with an additional 37% of UK respondents answering, “yes, probably” (Eurobarometer 2016*). While there is an apparent discrepancy between public stated concerns/stated willingness to pay for welfare benefits and actual purchasing behaviour in relation to animal welfare, this is in part explained by consumers’ expectation that government action and retailer assurance guarantees minimum welfare standards. While meta-analyses exist of public willingness to pay for farm animal welfare more generally (Lagerkvist and Hess 2011), we have not attempted to monetise the public or consumer value delivered by assumed improved compliance with welfare at slaughter requirements.
Benefits to slaughterhouses

33. To the extent that consumers value animal welfare, including welfare at slaughter, CCTV may provide greater assurance down-stream in the supply chain around the slaughter process and confidence in the products which they source. Indeed many retailers currently require CCTV. This enhanced consumer confidence may ultimately generate greater returns for slaughterhouses, although this has not been monetised.

34. Aside from generating business efficiency improvements associated with improved compliance, CCTV can also be used as a tool to help identify and implement other business improvements. For example, FAWC suggest that CCTV could provide the following benefits to food business operators, which have not been monetised:
   - contributing to reviews of effectiveness of operations and enable the food business operator to make improvements to processes and operating instructions;
   - a valuable training tool for slaughterhouse staff;
   - encouraging collective responsibility in slaughterhouse staff;
   - enabling disputes to be resolved more easily.

Benefits to the FSA

35. FAWC’s report identified a series of benefits for inspection and enforcement. CCTV can observe and record real-time slaughterhouse processes, record individual events and contribute information to the auditing of animal welfare. It can enable the OV to observe live animals in high welfare risk areas as well as those that are inaccessible or dangerous to people. Ante-mortem inspection via CCTV can detect unguarded behaviours that might be hidden from human observers, e.g. lameness in sheep. We therefore expect that while CCTV will facilitate more comprehensive inspection and enable breaches to be detected more easily. In the context of taking enforcement action, CCTV footage has authenticity and transparency as evidence and can be retained for long periods. This is particularly valuable for prosecutions, making the process for building a case for prosecution more efficient as well as strengthening the overall case presented, and minimising dispute.

36. Overall we consider that the impact on FSA resources may be broadly neutral. In particular whilst these CCTV reforms may lead to more breaches being detected and to more enforcement action being taken more quickly and more easily, we also consider that the deterrent and preventive effects of CCTV should lead to fewer breaches occurring.

Benefits to other parts of the Government

37. Benefits to the Government, including to Defra, the Crown Prosecution Service, and the Ministry of Justice, are assumed to remain broadly neutral, on the understanding that the FSA will be engaged in the same level of enforcement activity as now.

EANDCB and OI3O

38. Direct costs to businesses have been quantified, but the benefits to business have not been quantified. The direct costs to business constitute one-off costs of around £650,000 plus ongoing annual costs of around £260,000. Using the BIT Assessment Calculator the EANDCB is £0.3m and the business NPV is -£2.63m. This is a qualifying regulatory provision under the SBEE act and is in scope of One-In, Three Out.
Risks and assumptions

39. It is assumed that the number of slaughterhouses installing CCTV has now reached a stable figure and that more slaughterhouses are unlikely to install CCTV without a requirement to do so. It is assumed that costs of the technology for CCTV will not increase significantly over the next couple of years. It is assumed that the level of enforcement activity will remain broadly neutral as the improved ability to detect breaches and to take enforcement action may be balanced by fewer breaches arising.

Small and micro business assessment

40. We are aware there are several large companies that run slaughterhouses in the red meat and poultry sectors but data from public records shows that between 50 and 75% of slaughterhouses are small or micro businesses. We recognise that the impact on small businesses may be more of a financial burden however many of these small businesses already have CCTV and exempting small businesses from the regulation would undermine the effectiveness of the policy objectives. However, Government needs to be proportionate and fully assess the impact on smaller businesses of requiring CCTV to be installed. As such we are seeking views on this as part of this consultation.

41. Smaller premises should be able to meet the proposed requirements with a less extensive CCTV system than larger premises, thus limiting costs. We recognise that the financial impact on small businesses may still be considered a burden, however, we do believe that exempting small businesses from the regulation would undermine the effectiveness of the policy objectives.

Summary and preferred option with description of implementation plan

42. The current voluntary approach to the installation and operation of CCTV in slaughterhouses to improve animal welfare has not provided universal or comprehensive uptake. In order to realise the potential benefits to improved animal welfare (and other benefits which could accrue to the FBO) in all slaughterhouses a mandatory approach is preferred. This consultation is seeking views on this preferred approach and information on costs.

43. If the Government decides to proceed with making CCTV compulsory in slaughterhouses, then secondary legislation under the Animal Welfare Act 2006 would be necessary. The Government would decide on the implementation date depending on responses to this consultation. There may be a need for phased implementation to allow for the rate of investment for small and micro businesses.

44. FSA would enforce the regulation alongside their existing enforcement role in the slaughterhouse. FSA would need to consider the resource implications on an operational basis.

References


The Opinion on CCTV in slaughterhouses by the Farm Animal Welfare committee was published in 2015, so it is not considered necessary to repeat this analysis. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/400796/Opinion_on_CCTV_in_slaughterhouses.pdf

GOV.UK e-petitions -
https://petition.parliament.uk/petitions?q=CCTV+mandatory+slaughterhouses&state=all

CCTV in equine slaughterhouses - Hansard, 29 November 2016,

Eurobarometer 2016 -
http://ec.europa.eu/COMMFrontOffice/publicopinion/index.cfm/Survey/getSurveyDetail/instruments/SPECIAL/surveyKy/2096

Welsh Government recently published a report on CCTV in slaughterhouses -