

Mandatory CCTV recording in slaughterhouses – Defra Consultation.

Submission by UK Green MEPs Jean Lambert, Keith Taylor and Molly Scott Cato.

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Q1. Name: Jean Lambert MEP - on behalf of the three UK Green MEPs.

Q2. Your email: jeanlambert@greenmeps.org.uk.

Q3. Your organisation: UK Green Party MEPs: Jean Lambert, Keith Taylor and Molly Scott Cato.

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

Yes. There have been a significant number of investigations conducted in English slaughterhouses which have shown that vets are not picking up the abuses, poor practice and legal breaches that are occurring. The number of serious breaches officially recorded is dwarfed by the actual number of breaches.

The first investigation was made public in 2009. However, recent investigations show that the industry has failed to improve its practices in the intervening eight years. Clearly additional measures are needed to deal with abuses, poor practices and legal breaches. We welcome this proposal, and in particular would like to stress the importances of independent monitoring of CCTV, which will be essential for deterrence and for detecting problems. We would also like to highlight the important additional evidence which can be found in Animal Aid's 'Britain's Failing Slaughterhouses' report. [Ref: *Animal Aid, Britain's Failing Slaughterhouses, May 2017*, <https://www.animalaid.org.uk/wp-content/uploads/2017/05/Britains-Failing-Slaughterhouses-v6.pdf>.]

For CCTV to be effective, there needs to be a sufficient number of appropriately placed cameras in all areas of the abattoir where key handling, stunning and slaughter/killing operations are being undertaken. According to the 2016 FSA figures on red meat slaughterhouses across England Wales, those slaughterhouses which had CCTV for animal welfare monitoring varied on where they were positioned i.e. 37% had CCTV to cover the stunning area, 32% to cover the bleeding area and 39% and 42% to cover the lairage and unloading areas respectively. [Ref: *Food Standards Agency (FSA) Results of the 2016 CCTV survey in slaughterhouses in England and Wales, 2016.*]

A number of other countries have already taken steps on mandatory CCTV - namely France and Israel, with Italy, the Netherlands and Belgium's Flemish region expected to follow suit.

Q5. *Is it reasonable to require Food Business Operators to retain CCTV footage for 90 days? Please give reasons for your response.*

Yes. Vets and others must be able are able to look back over a period of time to determine whether a questionable action brought to their attention was a one-off incident or part of a systemic, ongoing problem. For the measure to be as effective as possible there does need to be a provision for retaining footage.

The cost of storing footage is minimal - it has been estimated at £25 per slaughterhouse per year. 90 days would be an appropriate and practical timeframe.

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.

N/A

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.

Yes

To maximise the effectiveness of this provision, slaughterhouse workers need to be aware that officials with a remit for animal welfare are able to watch their work in real time and at any time. This is the best way to deter illegal suffering being inflicted on animals in slaughterhouses. Being able to watch in real time also means that officials can identify and address problems as soon as they occur.

They must also have access to stored footage, so the duration of poor practice can be determined, and the question of whether it is widespread can be effectively assessed. It also means that officials will be able to take action on the basis of tip offs, and also that any allegations of poor practice or abuse can be assessed against evidence more effectively. Officials can check footage from times and days when their work has meant they are elsewhere. Stored footage will also be particularly valuable in providing evidence for criminal prosecutions.

We welcome unfettered access to footage for the FSA vets, however, we would also like to see an external, independent body oversee the monitoring of footage. There have been cases where vet action was lacking but could have made a real difference. For example, one slaughterhouse continued to slaughter cows using a stun pen that was not set up legally, and at another the layout of the slaughterhouse contributed to animal suffering. In such cases, robust action by vets could have rectified these issues before animals were caused additional pain and distress. Independent monitoring of footage has an important role to play in ensuring robust action is taken.

An independent body operating outside the slaughterhouse environment should be able to spot-check footage to act in the best interests of animal welfare without any risk of reprisals on the ground. In particular, we urge the Government to follow the recommendations of the 'Research Report on CCTV Monitoring in Slaughterhouses' (2016) by Prof Ian Rotherham and experts at Sheffield Hallam University. [Ref: 'Research Report on CCTV Monitoring in Slaughterhouses', Prof Ian D Rotherham et al, 2016. <https://www.animalaid.org.uk/wp-content/uploads/2016/10/RotherhamReport.pdf>.]

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.

CCTV is cost-effective and can be extremely helpful for monitoring procedures, training personnel, deterring abuse, and providing objective evidence, should allegations of malpractice be made.

Currently, 49% of red meat slaughterhouses and 70% of poultry slaughterhouses across England and Wales are operating CCTV facilities for animal welfare monitoring, so many have already made investments in this area. In 2011, when the requirement to install CCTV became mandatory in the 46 slaughterhouses operating under the Freedom Food scheme (now RSPCA Assured), it came to light that a significant proportion of them were already operating this technology. Of those who were required to install new systems, no members left the scheme due to problems of cost on installing the systems. [Ref: *Food Standards Agency (FSA) Results of the 2016 CCTV survey in slaughterhouses in England and Wales, 2016.*]

Although many slaughterhouses have installed this technology, many have not. A significant sector of the industry has been shown to be non-compliant with welfare laws, despite the presence of a vet and an appointed Animal Welfare Officer, and despite training and certification. Animal Aid's *Britain's Failing Slaughterhouses 2017* report details animal welfare laws being breached in 14 out of the 15 slaughterhouses assessed. [See Q4 response for report reference.] Mandatory CCTV will play an important part in addressing such breaches.

The granting of Certificates of Competence suggests that workers know – or should know - how to comply with the law. Independently monitored CCTV cameras will increase compliance even when no regulator is physically present.

CCTV cameras will deter abusive behaviour and will also detect it. Footage from cameras will allow vets and FBOs to provide ongoing training to staff, ensure compliance with welfare laws, and provide independent evidence of wrongdoing.

George Eustace has said that the cost of installing cameras is relatively modest. Improving animal welfare whilst reducing and deterring abuse are significant and important benefits to be gained from mandatory CCTV. In our view these benefits far outweigh the costs.

Q9. Are there other potential economic benefits or costs not set out in the Impact Assessment? Please provide evidence to support your response.

The aim of having CCTV is to ensure the law is complied with and standards improve. It may be that slaughterhouses therefore have to improve training and working conditions for staff in order to meet these requirements. We consider this to be of overall benefit for animal welfare, workers and consumers and positive for the domestic market.

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

Yes. Evidence shows that workers at slaughterhouses of all sizes have broken animal welfare laws.

To ensure the entire industry is better regulated, and that illegal acts are deterred and detected right across the board, CCTV should be made mandatory for all slaughterhouses.

The Farm Animal Welfare Committee (FAWC) recommends that: 'In order to realise the potential benefits to animal welfare and to businesses...all approved slaughterhouse operators...should install CCTV in all areas where live animals are kept and where animals are stunned and killed.' [Ref: *Farm Animal Welfare Committee (FAWC), Opinion on CCTV in slaughterhouses, p.17, February 2015.*]

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

Mandatory CCTV requirements need to extend to all slaughterhouses including small businesses. However, a longer notice period for compliance could be offered for the very smallest slaughterhouses.

Q12. Have we identified the main potential animal welfare gains from CCTV in slaughterhouses? Please give any other potential animal welfare gains

Yes, the potential animal welfare gains from mandatory CCTV have been identified.

However, there are additional gains beyond animal welfare which which should also be acknowledged. Some of these will help vets and hygiene inspectors operate more effectively.

CCTV can have positive benefits in terms of health and safety. For example, by deterring acts that could lead to injuries and deaths. Footage could help determine how accidents occurred and prevent them occurring again. The following examples have been cited: the accidental shooting of a worker at Sandyford and the death of a man crushed at the same slaughterhouse, both in 2011. Injuries at other slaughterhouses have included a man airlifted to hospital after being injured in 2013; and a man crushed to death by machinery in 2011.

There have been a number of firearms thefts from slaughterhouses. Captive bolt guns have been taken from slaughterhouses, and there have been cases of these being used in violent incidents. CCTV could deter theft of potentially lethal equipment and other property. It could provide evidence to identify perpetrators.

There have been reports of slaughterhouse vets and hygiene inspectors being bullied. CCTV would protect them, and allow them to undertake their duties with confidence.

The primary reason and need for mandatory CCTV is to improve animal welfare and tackle the abuse and suffering of animals in slaughterhouses. However, because mandatory CCTV would be positive in these additional areas, this further strengthens the case for its introduction.

ENDS