

Petition P-04-433

CCTV in Slaughterhouses

January 2020

1. Introduction

This report summarises the Petitions Committee's consideration of a petition calling for the introduction of mandatory CCTV in slaughterhouses in Wales.

The petition

1. Petition P-04-433 CCTV in Slaughterhouses was originally submitted in November 2012 by Kate Fowler on behalf of Animal Aid, having received 1,066 signatures.

Petition Text:

We call on the National Assembly to urge the Welsh Government to introduce mandatory CCTV in slaughterhouses to help vets with better regulation and monitoring, to provide footage for training and retraining, to deter some of the animal welfare abuses filmed by Animal Aid, and to provide evidence for prosecutions should they be necessary.¹

2. Initial consideration

2. The petition was initially considered by the Petitions Committee in the fourth Assembly, which engaged in correspondence with the then Minister for Environment and Sustainable Development, John Griffiths AM. During this period the Minister indicated that the issue of CCTV in slaughterhouses was being

¹ P-04-433 CCTV in Slaughterhouses



considered by the Welsh Government and a public consultation held during 2012 had demonstrated support for it.² However, the Minister cautioned that resources would need to be attached to ensure that the installation of CCTV had the desired impact, that it could result in attention being diverted from other issues and that “the Welsh Government would need to show that there was a reasonable basis for a decision to introduce legislation”.³ The Minister indicated that the Government would work with industry and welfare organisations to consider the issue further.

3. Subsequently the Welsh Government sought advice in relation to unobserved monitoring at slaughterhouses, including CCTV, from the Farm and Animal Welfare Committee (FAWC). The FAWC, a UK body, provided this advice to the Welsh Government and other devolved bodies in February 2015.⁴ The advice strongly recommended that all Food Business Operators (FBOs) should install CCTV in all areas where live animals are kept and where animals are stunned and killed, as part of a holistic approach to ensuring high standards of animal health and welfare.

4. The then Deputy Minister for Farming and Food, Rebecca Evans AM, issued a statement in October 2015:

“My firm belief is that every slaughterhouse in Wales should have CCTV installed in line with the FAWC recommendations. I am determined to make this happen. I sincerely hope that this can be achieved with the full support of the industry in Wales. It is for this reason that I am inviting Food Business Operators to participate in a task and finish group with Government to take this agenda forward and identify what else could be done to enhance standards. I will be asking the group to engage with key questions such as how the footage should be monitored and stored.”⁵

3. Consideration during the fifth Assembly

5. Following the 2016 Assembly elections, the current Petitions Committee took over responsibility for considering the petition.

² [Minister for Environment and Sustainable Development to the Committee](#), 19 December 2012

³ [Minister for Environment and Sustainable Development to the Committee](#), 1 March 2013

⁴ [Farm and Animal Welfare Committee, FAWC opinion on CCTV in slaughterhouses](#), 3 February 2015

⁵ [Written Statement by the Deputy Minister for Farming and Food](#), 8 October 2015

6. The report of the task and finish group established by the Deputy Minister for Farming and Food - The Safeguarding Animal Welfare at Slaughter Task and Finish Group - was published in October 2016. This concluded that “there are a number of controls already in place in Welsh abattoirs”, including the permanent presence of official veterinarians and daily recording of incidents, and that “CCTV is a useful additional tool” [their emphasis]. However, its’ main recommendations was that:

“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.”⁶

7. The Task and Finish Group provided a “checklist” to help abattoirs identify whether or not they would benefit from CCTV in all or some areas of their plants.

8. Following a range of criticism from the petitioners and others, and questions from the Committee, the Welsh Government acknowledged in early 2017 that the Task and Finish Group had “considered the use of CCTV in slaughterhouses from an industry perspective” and had “generate[d] much comment from both sides of the debate”.⁷

9. As a result the Wales Animal Health and Welfare Framework Group, a publicly appointed body, was asked to provide an “independent opinion” on the report and the wider issue. It also concluded that:

“[...] based on the statistics presented concerning the number and type of welfare incidents in slaughterhouses, and the important role played by smaller slaughterhouses in parts of Wales, that currently there is not sufficient basis upon which to make CCTV a mandatory requirement.”⁸

⁶ Safeguarding Animal Welfare at Slaughter Task and Finish Group report, The Need for and Possible Implementation of a Workable System of CCTV in All Slaughterhouses in Wales, October 2016

⁷ Leader of the House and Chief Whip to the Committee, 20 March 2017

⁸ Cabinet Secretary for Energy, Planning and Rural Affairs to the Committee, 13 March 2018

10. In March 2018 the Cabinet Secretary for Energy, Planning and Rural Affairs, Lesley Griffiths AM⁹ wrote to the Petitions Committee with the latest Welsh Government position on this issue:

“There are a number of controls already in place in slaughterhouses and official veterinarians are present, overseeing welfare and compliance with regulations. The larger slaughterhouses, which process the majority of animals, have CCTV and official veterinarians are able to access footage if they suspect welfare standards are not being met.”¹⁰

11. In response, the petitioners argued that this approach is ineffective in practice:

“It is important to be reminded of the shortcomings of this voluntary approach. OVs [official veterinarians] can access footage only in slaughterhouses that have cameras, and where those cameras are installed in the correct parts of the slaughterhouse, turned on, facing the right way, and where the footage is retained. Moreover, it depends on FBOs [Food Business Operators] voluntarily handing over that footage. The FSA [Food Standards Agency] admitted in April 2016 that 33 slaughterhouses in England and Wales were refusing to hand over their footage when requested by regulators.”¹¹

12. They also suggested that the lack of evidence of welfare breaches in Wales, referred to by both previous groups and the Cabinet Secretary, was due to the fact that no undercover investigations had been conducted within slaughterhouses in Wales and was not indicative of a different context or better standards.

13. As part of her correspondence of March 2018, the Cabinet Secretary acknowledged that the Framework Group had supported the aspiration for there to be CCTV in all slaughterhouses in Wales. As a result she stated that officials would be working with the industry “to take further steps” to safeguard animal welfare. In a Written Statement published the same month the Cabinet Secretary announced the launch of a Food Business Investment Scheme to provide a package of grant aid for small and medium sized slaughterhouses in Wales. This was stated to “include both capital investment and provide advice on animal

⁹ Title changed to Minister for Environment, Energy and Rural Affairs in December 2018

¹⁰ [Cabinet Secretary for Energy, Planning and Rural Affairs to the Committee](#), 13 March 2018

¹¹ [Animal Aid to the Committee](#), 4 April 2018

welfare, business improvement and technical matters”. In relation to CCTV, the Cabinet Secretary stated:

“The grant aid will also help these businesses install and upgrade CCTV monitoring systems. I want to assist businesses to put systems in place while legislating for CCTV in slaughterhouses is taking place in England. I want Wales’ slaughterhouses to be fully prepared as I continue to explore opportunities to legislate in the longer term.”¹²

14. The petitioners gave a cautious welcome to this:

“While we welcome the Minister’s plans to help smaller Welsh slaughterhouses improve welfare, we feel certain that in order to detect and deter abuses and poor practice – and to achieve full CCTV coverage across the sector as well as throughout individual slaughterhouses – legislation will be required. We see this move very much as a first step towards that.”¹³

15. Following a meeting on 5 June 2018, the Petitions Committee wrote to the Cabinet Secretary to put its’ support for the petition’s call for CCTV to be made mandatory in slaughterhouses in Wales in writing.

16. Subsequently, on 3 July 2018 the Committee raised this issue with the Cabinet Secretary during an oral evidence session on several petitions.

17. The Cabinet Secretary reiterated that the merits of legislation in this area remained under consideration. However, she stated the majority of slaughterhouses in Wales have CCTV and, because those that do include larger premises, the majority of animals are slaughtered in premises that already have CCTV in operation. She also indicated that a lack of evidence of a problem was a consideration:

“We’ve got incredibly high animal welfare standards. I have not received any complaints about any of the abattoirs. I’ve had a bit of speculation, but what I’ve always said is, ‘Come back to me with evidence and we’ll look into this’, and I haven’t had that. So, I think it’s better to work in partnership with the sector.”¹⁴

¹² Welsh Government press release, [£1.1m grant aid scheme for small and medium size slaughterhouses](#), 22 March 2018

¹³ [Animal Aid to the Committee](#), 22 May 2018

¹⁴ [Record of Proceedings](#), 3 July 2018, para. 164

18. The Cabinet Secretary indicated that a lack of finance had been raised with her as a barrier to wider installation of CCTV and, therefore, her priority at that time was to bring forward the grant scheme. The Cabinet Secretary also stressed that the scheme would provide wider support and not simply funding:

“And, as part of the package of this scheme, they will be given advice around animal welfare as well as business advice. It’s not just about CCTV for me. You also must remember that there are always official veterinarians when slaughter takes place, so I think we’ve got lots of protection there already. But, as I say, take that barrier away, because that’s what was raised with me by a couple of people, put the funding there and we’ll take it from there, but I have not ruled out making it mandatory.”¹⁵

19. In response to a question about monitoring the uptake of CCTV in slaughterhouses, the Cabinet Secretary stated that:

“There are only 24 abattoirs in the whole of Wales, so it will be very easy to monitor.”¹⁶

20. However, the indication of a lack of evidence has been disputed by Animal Aid and a member of the public, David Grimsell, who wrote to the Committee on several occasions:

“The Cabinet Secretary has also sought to imply that she has no evidence of welfare at slaughter issues. She referred at the meeting to there only being ‘some speculation’, yet this is very disingenuous indeed. In England thorough undercover investigations revealed that in 13 out of 14 slaughterhouses investigated there were serious and widespread breaches of welfare regulations and, in many cases, overt cruelty. This evidence was supplied to the Food Standards Agency and prosecutions have followed from it. While it is true that similar undercover investigations have not been undertaken in Wales, it is overwhelmingly likely that similar problems exist here too. After all Welsh slaughterhouses process very large numbers of animals, they do so using plants that operate as those in England do, they have the

¹⁵ [Record of Proceedings](#), 3 July 2018, para. 170

¹⁶ [Record of Proceedings](#), 3 July 2018, para. 179

same purported ‘controls’ administered by the Food Standards Agency, and they are even often run by the same companies.”¹⁷

21. Both parties also suggested that a voluntary scheme alone was unlikely to result in sufficient safeguards on welfare. Animal Aid told the Committee:

“And while we thank the Minister for her actions to promote voluntary uptake for CCTV, we should remind her that the voluntary system did not work in England, which is why Defra finally acted to make cameras mandatory.”¹⁸

22. David Grimsell stated that the funding being made available to the industry would be insufficient if it was not accompanied by additional criteria or guidance:

“Some funding to be used or not to facilitate CCTV, without requirements relating to siting and usage, without requirements relating to access and monitoring of footage and on a voluntary basis avoids the issue and fails to comprehensively protect the welfare of animals at slaughter in Wales.”¹⁹

23. Following the evidence session with the Cabinet Secretary the Committee wrote to seek assurances that all slaughterhouses would be encouraged to apply for the grant funding available for the installation of CCTV, and that those that choose not to apply would be closely monitored. The Cabinet Secretary’s response confirmed that all operators of small and medium sized slaughterhouses were informed of the Food Business Investment Scheme, and that:

“Abattoirs that do not apply for grant funding will continue to be monitored closely through the controls already in place which ensure animal welfare standards remain high in Welsh slaughterhouses.”²⁰

24. Following consideration of the evidence received to that point, the Committee wrote to the Cabinet Secretary again in October 2018 to reiterate its’ view that the Welsh Government should make CCTV mandatory in Welsh slaughterhouses. The Committee also requested details of the slaughterhouses in Wales without CCTV installed.

¹⁷ [David Grimsell to the Committee](#), 5 September 2018

¹⁸ [Animal Aid to the Committee](#), 18 September 2018

¹⁹ [David Grimsell to the Committee](#), 5 September 2018

²⁰ [Cabinet Secretary for Energy, Planning and Rural Affairs to the Committee](#), 18 August 2018

25. In response the Cabinet Secretary stated that the uptake of the funding scheme would be reviewed but that:

“I do not have a definitive list of all slaughterhouses in Wales without CCTV in place.”²¹

26. Separately, the Committee was sent a response that the Welsh Government had provided to a Freedom of Information (FOI) request, which showed that:

- 14 slaughterhouses in Wales did not have CCTV installed;
- the Government does not hold figures on the number of animals slaughtered annually in slaughterhouses without CCTV installed;
- the Terms and Conditions of the Food Business Investment Scheme included “no specifications relating to the placing and number of cameras, length of time for the footage to be retained and access to recordings”.²²

27. In response to another petition (see section 5), the Minister for Environment, Energy and Rural Affairs provided an update on the Food Business Investment Scheme in October 2019. This stated that this Scheme opened to initial expressions of interest (EOI) on 30 September 2018, which had elicited a “positive response” from slaughterhouses, and that EOIs were now being progressed to full applications with a January 2020 deadline. The Minister also stated:

“Successful applicants of the scheme are being provided with guidance on installation and management of CCTV and are expected to adhere to a protocol jointly developed and agreed by the Food Standards Agency and industry bodies to enable Official Veterinarians access to CCTV footage. Grant supported investments will be inspected when the projects are completed and if there is evidence that protocols are not being adhered to across the industry I will be prepared to legislate.”²³

28. During the Committee’s consideration of the petition there have been relevant developments in other parts of the United Kingdom. On 4 May 2018

²¹ [Cabinet Secretary for Energy, Planning and Rural Affairs to the Committee](#), 17 October 2018

²² [Welsh Government response to Freedom of Information Request ATISN.12673 - Animal Slaughter in Wales](#), 31 October 2018

²³ [Minister for Environment, Energy and Rural Affairs to the Committee](#), 22 October 2019

legislation came into force which required all abattoirs in England to have CCTV.²⁴ All slaughterhouses were required to comply with the new law by 5 November 2018 and the UK Government also produced guidance containing requirements in relation to the operation of cameras, retention of recordings and their availability for inspection.

29. In January 2019, the Scottish Government announced that it would be bringing forward legislation to make CCTV mandatory in all slaughterhouses in Scotland, following a public consultation on the issue.²⁵

30. The same month, the Committee received correspondence from the British Veterinary Association (BVA) which supported mandatory CCTV recording all slaughterhouses in Wales. A policy statement provided by the organisation states:

“BVA considers that all slaughterhouses should be required to install CCTV in all areas where live animals are kept and killed, in order to provide a clear and uninterrupted recording of all activities within these areas.

[...] The CCTV footage should be regularly observed and verified according to an agreed protocol and should be used as an additional training, observing, verifying, and enforcement tool to ensure the relevant legal requirements are met and high animal welfare standards are maintained.

[...] It is recommended that OVAs as well as other enforcement officers must have access to any CCTV footage and this should be written into UK legislation.”²⁶

4. Undercover filming in Wales

31. In September 2019 Animal Aid published allegations and video evidence obtained from covert filming within a slaughterhouse in Wales, Farmers Fresh in Wrexham. This received media coverage during early September and was provided to the Committee as a written submission on 17 September 2019.²⁷

²⁴ UK Government Department for Environment, Food and Rural Affairs, [CCTV becomes mandatory in all abattoirs in England](#), 4 May 2018

²⁵ Scottish Government, [Animal welfare improved](#), 9 January 2019

²⁶ [British Veterinary Association policy statement: CCTV in slaughterhouses](#)

²⁷ [Animal Aid to the Committee](#), 17 September 2019

32. Animal Aid claim that their “investigators” took four sets of footage at the slaughterhouse between 26th March and 3rd June 2019, which shows the treatment of sheep within the slaughterhouse in two main locations: the loading point for a conveyer belt towards the slaughter-line; and the stunning and slaughter area itself.

33. They express a number of concerns with the practices seen in the footage and highlight examples where:

“Sheep were dragged along by their throats and pulled by their ears, picked up by their fleeces, as well as being kicked, slapped, shouted at, or kneed roughly into the mouth of the conveyer restrainer. When animals became ‘stacked’ on top of each other in the conveyer, they were often pulled backwards by their legs or left to travel upside down in the conveyer.”²⁸

34. In the slaughter area itself, they state that the footage shows a variety of examples where animals were mistreated or where stunning and killing was carried out improperly. They highlight examples where:

- “A worker fails to properly stun a sheep, who surges forwards onto the cutting table. Two workers pin her down, and whilst she would appear to be fully conscious, her throat is cut.”
- “The stunning process was often utterly incompetent. Workers were seen misapplying tongs to the animals’ necks, snouts and faces and even to the leg of an animal on one occasion.”
- “Many stuns appeared very brief, often just a second or less, and there appeared to be no checks for signs of consciousness. We are deeply concerned that some of the animals may have been inadequately stunned and therefore may have been conscious when they went to the knife.”²⁹

35. Animal Aid acknowledges that Farmers Fresh appears to have CCTV in place within its premises. They argue that this demonstrates that importance of other factors and processes which should go alongside making CCTV mandatory:

“Of course, cameras alone do not deter law-breaking, and unless the footage is properly monitored, Food Business Operators (FBOs) do not

²⁸ [Animal Aid to the Committee](#), 17 September 2019

²⁹ [Animal Aid to the Committee](#), 17 September 2019

detect – or do not report – these breaches. It is unknown whether the FBO failed to monitor their cameras properly or whether they monitored them and simply failed to take sufficient action to prevent the abuse. We have no insight into the access granted to the Official Vet, in order to monitor the footage.”³⁰

36. They argue that, alongside making the use of CCTV mandatory, it is essential that an independent body is given responsibility for monitoring footage.

“[...] Farmers Fresh slaughterhouse had CCTV installed but without rules pertaining to its placement, use, operation and storage it cannot truly be deemed an effective tool.”³¹

37. As part of their latest submission, Animal Aid also shared the results of an FOI request made to the Food Standards Agency in April 2019. These showed that between 5 April 2017 and 21 December 2018 there were a total of 76 animal-welfare related incidents recorded at slaughterhouses in Wales. These are categorised according to severity against four levels, with 28 incidents recorded as “serious non-compliance” and a further 15 considered “critical non-compliance”. The vast majority of these cases (65) resulted in the issuing of “verbal advice”, whilst two resulted in Welfare Enforcement Notices being issued and two were referred for investigation.³²

38. In November 2019, further allegations were published in the press in relation to the treatment of animals at the Farmers Fresh slaughterhouse in Wrexham. These related to footage apparently recorded in July and August 2019 by Animal Equality UK, at a time when the premises was already under investigation by the FSA as a result of the previous undercover filming.³³

5. Funding for monitoring and enforcement

39. A final issue that has been considered by the Committee is the sufficiency of funding available for the monitoring and enforcement of welfare standards in slaughterhouses. This has been raised both in relation to CCTV and animal welfare in slaughterhouses more generally. In November 2019, the Committee began

³⁰ [Animal Aid to the Committee](#), 17 September 2019

³¹ [Animal Aid to the Committee](#), 17 September 2019

³² [Animal Aid to the Committee](#), 17 September 2019

³³ [Mail Online, Shocking footage reveals sheep getting trapped in a conveyor belt and live animals trapped under carcasses at a Welsh slaughterhouse ALREADY under investigation for mistreating livestock](#), 4 November 2019

considering a petition specifically calling on the Welsh Government to “provide adequate funding to protect the welfare of farm animals at the time of their slaughter in Wales”.³⁴

40. The FSA delivers official controls in “approved meat establishments” on behalf of both the Welsh Government and the UK Government. In Wales, this activity is covered by a concordat and a Service Level Agreement (SLA) between the FSA and the Welsh Government. Under the SLA, the FSA carries out activities including animal welfare inspections, audits, enforcement, licencing and education.

41. The petitioner for the 2019 petition has provided information obtained through that same FOI request referred to in Section 3:

“For 2018/2019 the Welsh Government provided just £20,187 to enable the FSA to ensure animal welfare controls are implemented across all these 23 slaughterhouses. For the three years prior to this (i.e. 2015 to 2018) it provided in total only £33,627 (i.e. approximately £11,200 per annum).”³⁵

42. In a letter to the Chair of the Committee, the Minister for Environment, Energy and Rural Affairs confirmed that the funding recently provided to the Food Standards Agency for the purpose of welfare controls had been as follows:

- 16/17 - £7,402.96
- 17/18 - £14,678.97
- 18/19 - £20,187.00
- 19/20 (allocated) - £31,906.33 (current spend - £18,612).³⁶

43. The petitioner also stated that, prior to 2018/19, the total combined annual funding provided by DEFRA and the Welsh Government to enable animal welfare controls across 278 slaughterhouses operational in England and Wales amounted to £50,000.³⁷

³⁴ [P-05-916 Adequate funding to protect the welfare of farm animals in Welsh slaughterhouses](#)

³⁵ [Petitioner \(P-05-916\) to the Committee, 12 November 2019](#)

³⁶ [Minister for Environment, Energy and Rural Affairs to the Committee, 3 December 2019](#)

³⁷ [Petitioner \(P-05-916\) to the Committee, 12 November 2019](#)

44. The petitioner also drew the Committee's attention to figures quoted in an update prepared for an FSA board meeting, held in September 2018:

“Under the Service Level Agreement with Defra and Welsh Government, in 2017/18 FSA received a contribution of c£50k which does not meet the true costs of welfare official controls which we conservatively estimate to be in excess of £1m, only a small proportion of which is recovered from industry.”³⁸

45. The same update indicates that the combined funding was increased to £170,000 for 2018/19, with the increased amount contributing to an annual welfare themed audit, OV's [Official Veterinarians] time for recording non-compliances, referrals for investigation, general welfare enforcement and CCTV implementation and enforcement costs in England (Defra contribution only).

46. The petitioner concludes that:

“The levels of funding provided by the Welsh Government to enable animal welfare controls in slaughterhouses are entirely inadequate to do so in relation to the range of controls needed, the number of slaughterhouses to be covered and the many millions of animals ‘processed’ by them each year.”³⁹

CONCLUSIONS

We recognise the work that has been carried out by successive Welsh Government Ministers, including the current financial support being provided to slaughterhouse operators in Wales. We also note the Minister's statement that she is prepared to legislate in the future if the current voluntary approach does not have the desired impact. However, we do not consider that a purely voluntary approach is sufficient, especially if it is not supported by a fit-for-purpose and adequately resourced inspection and monitoring regime.

Therefore, based on our consideration of both petitions and the evidence we have received, we believe that there are strong animal welfare justifications for introducing comprehensive coverage of CCTV in all areas in Welsh slaughterhouses where animals are kept and slaughtered. It is our view that the Welsh Government should act to make CCTV mandatory in slaughterhouses in

³⁸ Food Standards Agency, [Animal Welfare Update](#), Board Meeting 19th September 2018

³⁹ [Petitioner \(P-05-916\) to the Committee](#), 12 November 2019

Wales, and that this should be supported by an appropriately resourced monitoring and enforcement regime.

We consider that the current levels of funding provided to the Food Standards Agency are inadequate, by themselves, to deliver confidence that welfare standards are appropriately scrutinised and upheld in Welsh slaughterhouses. We are concerned that recent investigations into the treatment of animals at the time of slaughter have resulted from evidence gathered through undercover filming rather than through existing monitoring processes.

We have therefore reached the following conclusions:

Recommendation 1. The Welsh Government makes the installation and maintenance of CCTV monitoring systems mandatory in all slaughterhouses in Wales. This should cover all areas of the premises which are involved in the holding or processing of live animals and supported by requirements on the placement and operation of cameras, and the retention and storage of recordings and the availability of recordings for inspection.

Recommendation 2. The Welsh Government ensures that the Food Standards Agency, or another appropriate body, is provided with a sufficient level of resource to monitor and enforce the new CCTV monitoring system in slaughterhouses in Wales.

Recommendation 3. The Welsh Government ensures that the Food Standards Agency is provided with a sufficient level of resource to undertake its animal welfare delivery activity in Wales, with consideration given to the FSA's estimates of the cost of delivering official controls.