

21 September 2017

BVA, VPHA, AND AGV JOINT CONSULTATION RESPONSE TO DEFRA'S MANDATORY CLOSED CIRCUIT TELEVISION (CCTV) RECORDING IN SLAUGHTERHOUSES PROPOSALS

- 1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) The Veterinary Public Health Association (VPHA) is a division of BVA and is committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.
- 3) The Association of Government Veterinarians is a specialist division of BVA representing the views of veterinarians working in UK Government Departments and Executive.
- 4) We welcome Defra's proposal to introduce mandatory closed circuit television (CCTV) in all slaughterhouses as an additional enforcement measure under the Animal Welfare Act 2006. We support the introduction of mandatory CCTV in all areas where live animals are kept, handled, stunned or killed in slaughterhouses, with unrestricted access to CCTV footage for Official Veterinarians (OVs). However, it is important to reiterate that CCTV footage checks are a valuable additional enforcement measure and must not reduce or replace the physical monitoring and verification of animal welfare and meat hygiene requirements that OVs currently undertake.
- 5) **Question 4: Should there be mandatory CCTV recording in all approved slaughterhouses in areas where live animals are present?**
We strongly support mandatory CCTV recording in slaughterhouses in all areas where live animals are present, with unrestricted access to real time and stored footage for Official Veterinarians. CCTV is a useful tool in helping to ensure that legal requirements are met and high animal welfare standards are maintained. The introduction of mandatory CCTV in all slaughterhouses will:
 - Increase opportunities to observe and verify handling of animals
 - Increase opportunities to observe and verify the proper application of the stun process
 - Increase opportunities to protect the food chain and public health
 - Contribute to increased consumer confidence that FBOs are taking all necessary steps to prioritise, assess and address animal welfare issues

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- Provide a valuable training tool for slaughterhouse staff to promote best practice and compliance with legislative and commercial standards
- Inform the continuous improvement of slaughter processes and business operations
- Provide supplementary evidence in response to any allegations of illegal practice

6) Positioning, maintenance and quality of footage

CCTV systems should operate to an agreed standard and be maintained by a reputable supplier. The installation of a poorly positioned, low-quality CCTV system, may impede, as opposed to enhance, an OV's ability to monitor and verify compliance with animal welfare requirements. Therefore, in order to be effective, FBOs should be required to install CCTV in a manner that can provide a clear, unobstructed recording of all areas where live animals are unloaded, kept, handled, stunned and killed. Cameras must remain clean and free from dirt and condensation, with a suitable protocol in place to achieve this and provide ease of access to allow repair and upkeep - but not interference - with the cameras. As part of this, all images must be of a suitable quality (number of pixels) and number of frames per second to be admissible as evidence in a court of law. We would welcome further clarification as to what image quality, installation and maintenance requirements/standards proposed legislation will set out.

7) Question 5: Is it reasonable to require FBOs to retain CCTV footage for 90 days?

We would welcome the retention of CCTV footage for 90 days as a reasonable requirement. Such a requirement is in line with FAWC's recommendation, the requirements of several large retailers and the RSPCA Freedom Foods quality assurance scheme. As FAWC recommends, if there is an indication that footage might be used as evidence in enforcement action, it should also be retained beyond the 90-day period. In addition, to support authorised officers to verify CCTV footage retrospectively, there should be clear protocols in place that outline who is able to monitor the footage and why. Likewise, appropriate training should also be provided on how to carry out effective observational techniques and how to securely store and access recorded material for staff involved in reviewing CCTV footage.

8) We understand that the cost of 90 days storage would be relatively low and so not act as a financial burden to FBOs. Further, the retention of CCTV footage for 90 days would allow for the retrospective viewing of footage for training purposes which would be a useful training tool for both FSA and slaughterhouse staff, as well as informing overarching FBO business operations to consolidate an unwavering focus on animal welfare throughout slaughterhouse processes.

9) Question 7: Should there be unfettered access to CCTV footage, both real time and stored, for authorised officers?

Unrestricted access for Official Veterinarians and other authorised officers to real

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time and stored CCTV footage is paramount. The purpose of CCTV in slaughterhouses is fundamentally undermined if vets are refused access to footage and the footage is not monitored independently of the slaughterhouse business operator. Permitting unfettered access to real time and stored CCTV footage enhances Official Veterinarians' opportunities to monitor and verify compliance with animal welfare requirements retrospectively, and allows for the identification of suspected compromises or breaches of animal welfare for further investigation.

10) Refining existing legislation

At present, under The Welfare of Animals at the Time of Killing (England) Regulations 2015, all FSA Officers are allowed reasonable access to CCTV footage and are able to obtain stored CCTV footage if they suspect a breach in animal welfare regulations. However, if the FBO refuses access to recorded footage, it must be obtained through court ruling and securing a warrant, which can often be a protracted process. Unfettered access to real time and stored CCTV footage would therefore refine existing legislation, allowing for a more proactive and expedient approach to suspected breaches of animal welfare requirements.

However, as the consultation document recognises, the unrestricted viewing of CCTV footage should be seen as an additional management tool to protect animal welfare. CCTV should be used to complement, not reduce or replace, the existing physical presence and controls exercised by OVs in slaughterhouses to assess and maintain compliance with animal welfare standards.

11) Observation and verification

It should not be necessary for FBO staff to constantly observe slaughter operations via CCTV in real-time. As previously stated, CCTV footage should be regularly observed and verified according to an agreed protocol. In turn, the review and verification of CCTV footage, both real time and stored, should be fully incorporated into existing Official Veterinarian job roles and responsibilities, with corresponding remuneration for these additional duties.

12) Question 8. What are your views on the possible costs and benefits of these proposed reforms, as set out in the internal Impact Assessment?

The veterinary profession's first responsibility is to advocate for the best interests of animals and ensure as many kept animals as possible have a good life and a humane death. With this in mind, we consider that these proposals, as outlined in the internal Impact Assessment, will ensure high animal welfare standards are maintained and enable FSA Official Veterinarians to carry out their role in monitoring and enforcing animal welfare standards more efficiently and effectively, contributing to increased consumer confidence.

13) We recognise the monetised costs to slaughterhouses to install CCTV, as well as costs to maintain CCTV systems and store footage. However, we believe the extent of non-monetised benefits to a breadth of stakeholders - animals, OVs, slaughterhouse staff, the public and FBOs themselves- justifies any expenditure.

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14) Question 9. Are there other potential economic benefits and costs not set out in the Impact Assessment?

As slaughterhouses are demanding and hostile environments for electrical equipment, FBOs are likely to incur costs from providing an effective maintenance and replacement programme, as well as updating system hardware when necessary.

Likewise, FSA training for enforcement staff to enable them to know how and when to carry out checks, Data Protection requirements and how to take enforcement action, should also be considered within potential costs.

However, as stated above, we believe this expenditure is crucial to ensuring that mandatory CCTV is effective in its aims as an additional enforcement tool to protect animal welfare, and that, ultimately, any increased costs incurred are far outweighed by potential benefits for a wide range of stakeholders.

15) Question 10. Should CCTV be installed in all approved slaughterhouses regardless of size?

In order to ensure consistent enforcement and compliance of welfare standards, CCTV should be installed in all approved slaughterhouses regardless of size. Given the reduced size of smaller premises, the installation of CCTV systems should require less complex systems, resulting in lesser expenditure required by smaller businesses.

16) Micro-premises, under which EU Council Regulation 1099/2009 does not require the presence of an Animal Welfare Officer, may not recognise the immediate benefit of the installation of CCTV, as FSA staff already have a clear view and access to all parts of the stun and slaughter process. However, it is important to emphasise that there are still benefits to be realised from the installation of CCTV for these premises. CCTV footage will provide an objective record of individual events that can be used and retained for long periods, inform continuous improvement of slaughterhouse practices, as well as providing additional reassurance to consumers that all possible measures have been taken to ensure compliance with animal welfare requirements.

17) Likewise, there are several small premises (the FSA suggest those processing around 10 or less livestock units a day), where 'cold inspection' is permitted. In these premises, FSA presence is not required throughout the whole slaughter process, only for ante-mortem inspection and other required duties and later to carry out post-mortem checks once the carcasses have been dressed. In these circumstances, the installation of CCTV would provide an additional assurance of compliance with welfare standards in the absence of an FSA presence during slaughter, whilst providing the opportunities outlined above to use footage for training purposes, as well as to assess and improve business operations.

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18) Question 11. What do you think the Government could do to help small businesses comply?

In order to support small businesses to comply with proposed legislation at point of implementation, we would welcome the provision of a support scheme to cover some of the associated expenditure necessary to install, maintain and train staff to appropriately use a CCTV system.

19) Question 12. Have we identified the main potential animal welfare gains from CCTV in slaughterhouses?

As the consultation document outlines, we recognise the role of CCTV to promote improved compliance with animal welfare requirements, a tool to encourage continuous improvement in slaughterhouse processes and ultimately an additional management tool to facilitate OV's in the enforcement of animal welfare standards.

20) In addition, the way in which mandatory CCTV would enable FSA and other slaughterhouse staff to observe the practice of individuals throughout the slaughter process without a physical presence will not only enable staff to carry out their roles without the increased pressure that comes when working under direct scrutiny, but also reassure authorised officers that they are observing operative working as it would normally be carried out. CCTV monitoring will therefore provide assurance that animal welfare standards are being monitored through a wholly objective lens, providing a true reflection of working practices and enabling OV's to more effectively identify areas of poor practice and opportunities to improve compliance.

21) In terms of the educational potential of CCTV, the use of CCTV footage as a training tool in slaughterhouses will improve knowledge of animal welfare across slaughterhouse staff, promote best practice and consolidate animal welfare as a primary consideration for staff at every stage of the slaughter process.

22) We note that in paragraph 47 of the consultation document it is suggested that ante-mortem inspection could be carried out via CCTV. We would like to stress that the current physical ante-mortem inspections carried out by OV's should not be replaced or reduced by the implementation of mandatory CCTV.

23) As previously stated, mandatory CCTV is not a panacea for poor animal welfare standards, and should be considered as an additional management tool to protect animal welfare, complementing robust veterinary supervision. Similarly, whilst unrestricted access to real time and stored CCTV footage will facilitate the use of this footage for evidential purposes. CCTV remains difficult to use in prosecution processes, consequently the physical presence and controls exercised by OV's to protect animal welfare will remain key to enforcing compliance with animal welfare standards and encouraging continuous improvement.

24) Concluding remarks

BVA strongly supports the mandatory introduction of CCTV in all slaughterhouses regardless of size. Unrestricted access to CCTV footage from all areas where live

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animals are kept, handled, stunned and killed will help to maintain high standards of animal welfare and enable Official Veterinarians to enforce compliance with animal welfare standards with more efficiency and confidence.

- 25)** The implementation of mandatory CCTV in slaughterhouses must be supported by robust procedures, whereby CCTV is regularly observed according to an agreed protocol and CCTV systems are maintained to an agreed standard. FSA and slaughterhouse staff should also be supported with training that addresses effective observational techniques, maintenance and upkeep of recording equipment, as well as the use and secure storage of recorded material.
- 26)** We would welcome further clarification as to what image quality, installation and maintenance requirements/standards proposed legislation will set out to ensure that mandatory CCTV is effective in its aims to protect animal welfare.
- 27)** Finally, we would like to emphasise that continued robust veterinary supervision remains vital to the successful enforcement and protection of animal welfare standards. Mandatory CCTV should be considered as an additional enforcement tool for Official Veterinarians, used to complement, not reduce or replace, the current physical monitoring and controls OVs undertake to ensure high animal health and welfare standards at every stage of the slaughter process.