



April 4th 2018

Dear Petitions Committee,

Thank you for your continued interest in our petition which calls for mandatory CCTV in Wales' slaughterhouses, and for writing to the Cabinet Minister once again regarding this campaign.

We are, of course, disappointed with the Minister's response to the Committee in which she indicates that she will not make CCTV mandatory at this time. She does, however, commit to driving up welfare standards and, in recognition of the value of CCTV, she writes that Official Veterinarians (OVs) 'are [already] able to access footage if they suspect that welfare standards are not being met'.

It is important to be reminded of the shortcomings of this voluntary approach. OVs 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 voluntarily handing over that footage. The FSA admitted in April 2016 that 33 slaughterhouses in England and Wales were refusing to hand over their footage when requested by regulators.ⁱ

This voluntary approach also begs the question: what if the OVs don't suspect welfare standards are not being met? In many of Animal Aid's undercover investigations at 14 English slaughterhouses – where 13 were found to be breaking animal welfare laws – neither the FBO nor the FSA apparently had any idea that these breaches were occurring. If the vets in Wales' slaughterhouses were similarly unaware, they would not ask to see the footage.

While the Animal Health and Welfare Framework Group 'support the aspiration for there to be CCTV in all slaughterhouses in Wales', it does not go so far as to recommend mandatory CCTV for two reasons: the cost to smaller slaughterhouses and because in its view the number and type of welfare incidents revealed inside Wales' slaughterhouses were not deemed sufficient to warrant legislation.

To our knowledge, there have been no undercover investigations into Wales' slaughterhouses and so evidence of welfare breaches has not been discovered and revealed. Moreover, the regulators' own audits suggest that Wales' slaughterhouses are generally deemed to be of an acceptable standard, with just one slaughterhouse falling below the 'Generally Satisfactory' benchmark since January 2017.

However, it is not safe to assume that what happens on a day when the auditor visits – a pre-arranged visit when FBOs know exactly what they will be asked to demonstrate – is indicative of a typical day when an auditor is not standing before them. With that in mind, it

is all the more concerning that so many of Wales' 24 approved slaughterhouses failed to comply with fundamental legal welfare requirements during their audits in the past 16 months. For example:

- Requirement 24: personnel are required to demonstrate an appropriate level of competency in relation to animal welfare. Two slaughterhouses revealed severe breaches while three others revealed minor breaches.
- 25: the structure of the building itself must safeguard animal welfare. This is a fundamental issue and yet 10 slaughterhouses were unable to demonstrate full compliance with the law.
- 27: the scheduled arrival times and waiting times must safeguard animal welfare. Eleven slaughterhouses were unable to demonstrate full compliance, with two of them failing this aspect on two consecutive audits.
- 29: any crates or modules used to transport animals must be in an acceptable condition and handled appropriately. Two slaughterhouses failed to comply with this basic requirement.
- 210: lairaging conditions and pen provisions must be adequate – there must be bedding, water and food provision if the animals are kept overnight. One slaughterhouse displayed a serious breach of this legal requirement, while seven others were also unable to show compliance, three of them on two consecutive audits.
- 214: any stunning equipment must be adequately designed, constructed and maintained. One slaughterhouse displayed a serious breach of this legal requirement and another failed to be fully compliant.
- 215: the method of stunning must ensure quick and effective loss of consciousness and sensibility followed by death. Four slaughterhouses were not compliant with this requirement, with one of them failing on two consecutive audits.
- 216: there must be provision for back-up stunning and its use, yet five slaughterhouses were not fully compliant, with one failing to show compliance on two consecutive audits.
- 217: after stunning, checks to verify the animal is unconscious should be made. Four slaughterhouses failed to show compliance at their audits.

If slaughterhouses cannot comply with welfare laws when an auditor is standing in front of them, then action must be taken to protect animals at the most vulnerable time of their lives throughout the rest of the year.

The case Animal Aid puts forward for mandatory CCTV with independent monitoring is based on the significant welfare benefits to animals. However, there are other benefits, too, including ensuring compliance with hygiene regulations. In this regard, the audits of Wales' slaughterhouses over the past 16 months are deeply concerning. In some cases, it is unlikely CCTV would make a difference, but there are cases where cameras might be used to help drive compliance, such as:

- Requirement 32: all handling and processes from slaughtering to despatch must be done in a way that avoids the contamination of meat and offal entering the food chain. Just one slaughterhouse has been fully compliant with this requirement since January 2017; seven had a serious breach, while six more had a serious breach on two consecutive audits.
- 34: where relevant, all edible co-products are handled hygienically and subject to relevant controls (including raw materials intended for further processing). One slaughterhouse displayed a serious breach.
- 311: controls must ensure that risk of cross contamination is minimised, prevented or reduced to acceptable levels during operation and appropriate action taken should contamination occur. Two slaughterhouses displayed a serious breach, with a third seriously breaching this requirement in two consecutive audits.
- 314: wrapping and packaging materials must not be a source of contamination, and must be stored and handled in such a way that product contamination is avoided. One slaughterhouse displayed a serious breach.
- 41: design and layout must permit good food hygiene practice and protect against contamination between and during operations. Three slaughterhouses displayed a serious breach of this fundamental requirement.

There is, therefore, evidence that better regulation is needed in Wales' slaughterhouses to ensure full compliance with both welfare and hygiene requirements.

Ten days after the Cabinet Secretary wrote to the Petitions Committee, saying that she was determined to improve standards and practices, she announced a £1.1M Food Business Investment scheme package for small- and medium-sized slaughterhouses. This will include funds being made available for welfare-friendly infrastructure and facilities, including the installation and upgrading of CCTV monitoring systems.ⁱⁱ

While disappointed that the Minister has not announced a policy to make CCTV mandatory for Wales in line with the legislation that will shortly come into effect in England, Animal Aid nonetheless welcomes the Minister's commitment to welfare, and her indication that she will continue to explore opportunities to legislate for CCTV in the longer term.

Until that time, Animal Aid we will continue to make the case for mandatory CCTV with independent monitoring of the footage across Wales.

ⁱ <https://www.thebureauinvestigates.com/stories/2016-08-28/severe-welfare-breaches-recorded-six-times-a-day-in-british-slaughterhouses>

ⁱⁱ <http://gov.wales/newsroom/environmentandcountryside/2018/180322-1.1m-grant-aid-scheme-for-small-and-medium-size-slaughterhouses/?lang=en>