

**P-04-433 CCTV in Slaughterhouses, Interested Party to the Minister for Environment, Energy and Rural Affairs, 01.04.19**

Ms Lesley Griffiths  
Cabinet Secretary for Environment,  
Energy and Rural Affairs

By email

1<sup>st</sup> April 2019

Dear Ms Griffiths

You will be aware that in England it is now compulsory that CCTV is installed in all slaughterhouses. The Scottish Government has committed to legislating this year to require mandatory installation in Scottish slaughterhouses also. These are entirely appropriate steps in light of extensive evidence from fully documented undercover investigations in a large number of slaughterhouses of frequent breaches of welfare regulations, and of outright cruelty. They are supported also by evidence provided by Official Veterinarians (OVs), and through audit processes undertaken by both the Food Standards Agency (FSA) and Food Standards Scotland (FSS).

Wales has yet to make this commitment, with failure to date to recognise the importance of preventing breaches, detecting them and pursuing enforcement action. Bizarrely, you have sought to imply, without any basis, that poor practice, welfare breaches and cruelty observed in English slaughterhouses somehow do not apply in Wales. Yet, the slaughterhouses in England and Wales operate in very similar ways. They both process large numbers of animals, and they are both subject to the same 'official controls' that have been revealed to be so ineffective in detecting the number and severity of welfare breaches that occur. All reason implies that similar risks will occur in Welsh slaughterhouses and that similar protections (including CCTV) are needed to properly ensure animal welfare at slaughter.

When questioned (eg in the Assembly) you presume to support the Welsh abattoir industry with references to 'high welfare standards' in Wales, as if such assertions have any substance. In fact, they are contradicted by the evidence. The FSA conducts regular audits of both English and Welsh slaughterhouses against animal welfare and food hygiene criteria and publish the results of these. The most recently published data (1<sup>st</sup> March, 2019) for current audit status of all slaughterhouses show that, for pre-announced inspections with significant notice, **only 30% of Welsh slaughterhouses are given a 'Good' rating**. This compares with 46% of English slaughterhouses, and 89% in Northern Ireland. Only Scotland (subject to audits by FSS) performs worse than Wales, with just 17% of establishments gaining a 'Good' rating during 2018.

It is very concerning indeed that such a low proportion of Welsh slaughterhouses achieve a rating that does not imply any major non-compliances at a pre-announced inspection. Far from any evidence-free room for complacency about welfare standards at slaughter in Wales, this data implies that standards here are significantly lower even than England, and that there is likely to be a particularly strong need for compulsory CCTV installation in slaughterhouses in Wales. After all standards can be

expected to be lower still when visits by the FSA are not in progress.

You have to date presumed to listen only to industry voices. No consultation of Welsh citizens, and a complete lack of a critical and sceptical attitude towards industry claims that compulsory CCTV monitoring is not needed. Instead, some Government funding has been made available, with application to date received by only eight establishments. The Government continues to hold no data on how CCTV is deployed or used in Welsh slaughterhouses.

The Welsh Government has not made legislative requirements on how CCTV is to be used for any establishment that does use it. Astonishingly, instead it has agreed a 'protocol' with the meat industry (eg for CCTV installation funded through the Government) that severely restricts the potential for any footage obtained to be used to prevent or detect welfare breaches. This protocol, clearly influenced by meat industry pressure rather than putting animal welfare as the priority, includes, for example, the following conditions:

*'The purpose of the OV CCTV review is as an additional indirect verification of an FBO's animal welfare procedures, not as a replacement of direct practical official observations'.* (This has legal implications for the weight that might be put on documentary evidence obtained through CCTV).

*'The FBO will view the CCTV alongside the FSA veterinary staff in FBO offices'.* (Since there has been evidence of undue pressure on FSA staff operating in some abattoirs, this may be concerning).

*'The duration of the OV viewing of the CCTV should be reasonable and practical, and usually equivalent to up to 15 minutes additional check a day'.* (Not at all clear why there should be a presumption of such a severe restriction, and this would undermine both potential for deterrence and detection)

(note – OV – Official veterinarian; FBO – Food Business Operator).

Moreover the protocol is couched in terms not of preventing or detecting welfare breaches, but industry terms of 'verifying good practice'. The associated 'CCTV requirements August 2018' published by the Government is a flimsy, poorly specified document which fails to detail with any clarity whatsoever what is required, where CCTV should be sited, how it should be used and so on (see attached).

The most important issue is the need to protect the welfare of animals at the time of their slaughter, when they are at their most vulnerable. Any appropriate method that can help achieve such protection should be used. CCTV has been clearly identified as such a method including by the Farm Animal Welfare Committee (FAWC) which recommended that all FBO's should adopt it. The British Veterinary Association (BVA) and the FSA itself are consistent in recommending its mandatory use. The public have a right to expect that relevant welfare regulation arrived at through democratic process is properly and rigorously monitored and enforced.

All of these factors should not be over-ridden by an inappropriate concern

for positive impression management for the Welsh meat industry, and narrow collusion with it.

Yours

David Grimsell  
Welsh citizen.

cc.

David Rowlands, Chair of the Welsh Assembly Petitions Committee

Graeme Francis, Clerk to the Petitions Committee

Eluned Morgan, A.M. (Mid- and West Wales Region)

Neil Hamilton, A.M. (Mid- and West Wales Region)

Helen Mary Jones, A.M. (Mid- and West Wales Region)

Joyce Watson, A.M. (Mid- and West Wales Region)

Mike Hedges, A.M. Chair, Climate Change, Environment and Rural Affairs  
Committee

Sources

re FSA meat establishment audits

<https://data.gov.uk/dataset/43038f2d-6d94-4e6d-bbf9-04bf58726ad3/fsa-audits-of-approved-meat-establishments>

re FSS meat establishment audits

<https://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/approval-of-meat-plants>

re CCTV use protocol agreed between Welsh Government and meat industry  
bodies:

<https://gov.wales/sites/default/files/publications/2019-03/ATISN12984.pdf>