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11 January 2023

Dear Welfare at Slaughter Team

Please find answers to the questions posed in your letter of 24th November 2022. We are happy if you wish to get in touch with any of the issues raised below.

Question 1. What is the extent to which the regulations have achieved their objectives, as set out in the original Impact Assessment (IA)

The RSPCA firmly believes that the regulations have achieved their objectives and the IA as set out originally was correct. The RSPCA has not heard of any abattoirs closing down due to the introduction of mandatory CCTV which points to the IA costs being in line with what actually occurred. The RSPCA is aware that some small local abattoirs have closed since 2018 but believes this was not due to the CCTV implementation but due to wider issues such as inflation. The All-Party Parliamentary Group for Animal Welfare (APGAW) undertook a survey in its review of small abattoirs in 2020 during which they found an additional impact, that of excessive Official Veterinarian enforcement which led to the closure of at least one abattoir¹. No abattoirs reported that the introduction of mandatory CCTV was a reason for their closure.

Mandatory CCTV was introduced in England in 2018 following the failure of previous voluntary approaches. Whilst voluntary uptake of CCTV installation in slaughterhouses increased from 2012 to 2018, it then plateaued at around 49% of red meat slaughterhouses and around 70% of poultry slaughterhouses in England and Wales^{2,3}. When CCTV was introduced in England this resulted in uptake of CCTV to all operational abattoirs, highlighting the positive impact of the legislation.

¹<https://apgaw.org/2020/06/07/apgaw-publishes-report-on-small-abattoirs/>

²FSA, Results of CCTV survey in England and Wales slaughterhouses published, 31 August 2016

³https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses/supporting_documents/CCTV%20internal%20impact%20assessment%20%20final.pdf

The use and installation of CCTV has been proven a success in both assurance schemes and when mandated by Governments. Installation has been a requirement within the RSPCA farm animal welfare standards - as used by the RSPCA Assured scheme - since 2011, and prior to that was a recommendation within the standards since they were first developed in 1994. The RSPCA standards state that CCTV must be installed in all key areas where animal welfare could be compromised, including when the animals are undergoing the following processes: unloading from vehicles into lairage, restraint, stunning, and neck cutting. CCTV cameras must be positioned to ensure a clear and continuous view of the processes being monitored at all times when animals are undergoing such processes. No RSPCA Assured abattoir left the scheme after the requirement for CCTV was introduced.

Question 2. Are there any unexpected consequences, positive or negative, that your organisation has perceived or refinements that could be made to enhance benefits, reduce burden on business, reduce costs and/or improve compliance.

Prior to 2018 CCTV had been installed in areas aside from those where live animals are kept and where animal welfare could be compromised. In 2016 the percentage of slaughterhouses with CCTV in particular locations were: unloading 46%; lairage 43%; race and restraint 37%; stun area 37%; and bleed area 38% (FSA, 2016). The prescriptive requirements of the 2018 CCTV legislation has stopped cameras being placed in the wrong areas and so improved transparency.

CCTV has also improved access to footage by authorised officers. The Food Standards Agency (FSA) were previously provided with access to CCTV coverage only when they had a suspicion of possible non-compliance rather than in a more unfettered way. And, around 18% of abattoirs with CCTV prior to the introduction of legislation said they would not allow unfettered access to CCTV footage for OV's of the FSA. Mandating for unrestricted access for authorised officers, such as OV's, at all times has provided more opportunities to assess compliance with the legislation on a proactive and reactive basis.

As the APGAW report showed there were issues with OV enforcement including language barriers and perceived over-enforcement, which in some examples led to abattoirs closing down.

Question 3. Has requiring CCTV in all slaughterhouses led to benefits in animal welfare?

Yes. In 2015 official veterinarians on site reported 52 breaches of animal welfare in abattoirs. Of these 52 abattoir related cases, 32 were in plants with CCTV and 20 without, including 11 relating to the stun and kill. By 2022 10% of FSA enforcement action on infractions in abattoirs were undertaken using CCTV footage showing its use as an enforcement tool⁴.

Question 4. Has requiring CCTV in all slaughterhouses helped provide assurance that all slaughterhouses are operating to high welfare standards?

Yes. There is a consumer expectation that Government action guarantees minimum welfare standards and therefore regulation in this area would be consistent with that expectation.

As CCTV has provided an additional level of assurance and transparency it also can provide assurance to the abattoir operatives in the event of a complaint. For instance, in 2012, the RSPCA received a

⁴<https://www.food.gov.uk/sites/default/files/media/document/fsa-21-09-15-animal-welfare.pdf>

complaint about alleged malpractice at an RSPCA Assured abattoir. Pigs had been reportedly heard to be squealing to an unusually high degree during unloading into the lairage, leading to concerns that they were being mistreated. The complainant provided information about the exact time of the alleged incident, allowing an RSPCA Farm Livestock Officer to request the CCTV recording of the unloading area at the precise time in question. The footage showed that staff had behaved appropriately and in line with RSPCA welfare standards, and that the vocalising had not been caused by any staff malpractice.

The RSPCA is aware of at least four incidents of undercover filming in abattoirs since 2018 and the CCTV footage has provided a good record to show if the abattoir was compliant and how non-compliances could be managed.

Question 5. Has there been a reduction in animal welfare issues since introducing mandatory CCTV in all slaughterhouses?

This is difficult to evaluate as there are no baseline standards prior to the introduction of mandatory CCTV other than undercover footage on those farms not assessed by FSA. But it is the RSPCA's views that, whilst undercover footage has still shown instances of non-compliance since 2018, the number of these has reduced. The RSPCA would recommend that Defra agree on a set of indicators (other than prosecutions and non-compliances found by the FSA) that could measure the number of instances of animal welfare issues going forward.

Question 6. Have there been other costs or benefits of introducing CCTV cameras that weren't considered in the original Impact Assessment ([CCTV internal impact assessment final.pdf \(defra.gov.uk\)](#))?

The RSPCA believe the IA examined the costs and benefits of the CCTV programme.

CCTV can be used as a quality assurance tool to help investigate product quality issues. For example, if an issue concerning meat quality arises, such as haemorrhaging or bruising, then CCTV footage can be used to help identify the part of the process where this occurred, allowing for swift and effective remedial action to be taken. Slaughterhouses create negative impacts on the wider industry when they abuse animal welfare and this can generate wider adverse reputational costs applying to the whole sector, including the compliant majority. It could be argued that mandating the installation of mandatory CCTV has enhanced the reputation of, and positively impacted on, English food and produce.

CCTV can also be used in conjunction with the Fixed Penalty Notices that Defra is now consulting on under the Animals (Penalty Notices) Act 2022. The RSPCA would support the use of FPNs on non-compliances that CCTV highlights other than those that are serious animal welfare breaches which would still deserve further enforcement action through the courts.

Finally, CCTV also provides for enhanced security for both property (the slaughterhouse) and slaughterhouse personnel.

Question 7. What were the range of costs for installing CCTV systems?

Whilst the cost of installation may be a hurdle for the smaller abattoirs, this is outweighed by the benefits it gives. When RSPCA Assured plants were required to install CCTV in 2011, costs were reported to be between £3,000 and £10,000 depending on the size of the abattoir. In 2012, the Cross Party Group on

Animal Welfare in the Scottish Parliament heard evidence that the cost of installing CCTV in a slaughterhouse in Scotland would vary from £6,000 to £25,000, with an annual maintenance cost of around £600. The costs estimated in IA produced by Defra in 2018 seem reasonable.

Finally there is a potential cost of *not* installing CCTV via loss of public and consumer confidence, which could have a negative economic impact on the industry via adverse reputational costs and loss of business.

Question 8. Was a behavioural change noticed in staff after installation or a reduction in the number of animal welfare incidents since CCTV systems were introduced? Is CCTV used as a training tool?

The RSPCA has no information on behavioural change in non RSPCA Assured abattoirs but can report that when installation was made a requirement within the RSPCA farm animal welfare standards in 2011 there was a behavioural change noted at that time and CCTV continues to be used as a training tool for new staff.

Yours sincerely