

Review of The Mandatory Use of Closed Circuit Television in Slaughterhouses (England) Regulations 2018

Enforcement

Welfare and campaigning groups have had longstanding concerns about the enforcement of animal protection laws. Considering this, the Government's plans for mandating CCTV in slaughterhouses was viewed as a possible further tool for improving the issues with enforcing protection laws and of prosecuting breaches. However, a recent [report](#) by Animal Equality and the Animal Law Foundation demonstrated that this is an ongoing problem: the laws which are in place are not being enforced, which the report calls the 'enforcement problem'. The report cited a recent instance of behaviour at a duck slaughterhouse leading to suffering and distress for the birds. CCTV was in place at this slaughterhouse.

The report cites comments from [REDACTED] about the limitations of CCTV in ensuring best practice who suggests *"frequent inspection by trained, independent assessors is, of course, essential to ensure quality control. It is reasonable to expect that some visits be arranged in advance so that the abattoir staff can ensure that all records, CCTV footage etc. are available for inspection. However, I recommend that, in addition to these routine inspections, assessors should have the right to make unannounced visits to carry out spot checks on any, or all stages in the processes of handling, stunning and slaughter."*

It is not clear that the use of CCTV in slaughterhouses, as it currently functions, is effective in overcoming the 'enforcement problem'.

An undercover investigation by Animal Justice Project released in 2020 showed extreme abuse and suffering in one of the UK's largest, reputedly high welfare, duck slaughterhouses. The standard practices used in the slaughterhouse also highlighted the violence involved. CCTV was in operation in the slaughterhouse, which raises concerns over the effectiveness of CCTV. Further, analysis of FSA data relating to the slaughterhouse showed the slaughterhouse to be compliant with all welfare standards, despite the clear breaches shown within the undercover footage.

Policy Objectives

DEFRA's internal impact assessment states *"the policy objective and intended effects are to improve animal welfare in slaughterhouses and provide assurance that all slaughterhouses are operating to high welfare standards"*. Undercover investigations and problems with enforcement, present even in slaughterhouses with CCTV, suggest to us that the implementation of mandatory CCTV has had little impact in reaching the policy

objectives. We have seen no compelling data to suggest there has been an improvement in animal welfare or that every slaughterhouse operates to 'high welfare standards'. Footage obtained from slaughterhouses reaffirms that these are violent places where an animal's welfare is not paramount.

Rotherham Report

Independent research [report](#), CCTV Monitoring in Slaughterhouses, published in 2016, established the use of CCTV in slaughterhouses to be 'cost effective and feasible'. The report set out how an independent system of monitoring could be conducted. We are not aware of any evidence produced since that would contradict the overall findings of this report, namely that *'The clear conclusion is that the current system of welfare monitoring is failing and that compulsory use of CCTV with independent monitoring is the only robust solution.'*

Evidence of impact of CCTV on behaviour

Currently there have been no studies or independent reviews of the impact of CCTV on behaviour in slaughterhouses. The Government's review due to be published on 4th May 2023 should help shed some light on this issue. However, at this point in time, we have reservations in concluding that CCTV has significantly impacted behaviour in slaughterhouses. Our investigations and the numerous investigations by other organisations continue to uncover instances of abuse, even in slaughterhouses with CCTV present. The general evidence for CCTV significantly deterring violent behaviour generally is also not obvious. The college of Policing's [research](#) into the impact of CCTV suggests *"No overall statistically significant effect was observed for violent crime (29 studies) or disorder (six studies)"*.

Behaviour change in slaughterhouses post-legislation

The evidence for the effectiveness of CCTV in deterring violent behaviour and crime is mixed. FAWC [opinion](#) on CCTV in slaughterhouses recognises CCTV may have an impact, but the opinion suggests that this in combination with good training, motivation and the physical presence of an OV or FBO supervisor is needed for sustained behaviour change, with regular, and sometimes unannounced, inspections.

Broader welfare concerns

Slaughterhouses are just one aspect of a farmed animal's life. There are wider welfare concerns about the life of an animal on farm and during transportation. Live transportation can cause distress and health concerns for live animals and there is no culture of transparency for this aspect of an animal's life.

Standard practice

Undercover investigations have not only highlighted the most severe cases of illegal practice and abuse, but they have also shed a light on the suffering caused by standard practices in slaughterhouses.

Issues around monitoring footage

We have concerns over the monitoring of slaughterhouse CCTV footage. It may not be financially feasible for CCTV in all slaughterhouses to be independently monitored around the clock. Even with the best intentions, abusive behaviour can go unnoticed. CCTV is also not accessible to welfare charities and organisations, so does not support further transparency in the slaughter process. This is a further reason why when complaints are made and CCTV does provide evidence, effective enforcement is paramount to set a precedent and deter future abusive behaviour and reinforce the value of CCTV. CCTV without independent monitoring is only one step in the right direction.

No such thing as humane slaughter

It's not just the worst instances of abuse that cause animal suffering. Even standard practices at slaughterhouses cause animals distress and are not pain-free. No amount of oversight could make the killing of animals, who do not want to die, a humane process.

We hope that the Government's review of the CCTV regulations will shed light on the impact of CCTV on human behaviour. However, our [investigative](#) work and the work of other animal welfare groups and animal rights campaign groups suggest there is still a problem with malpractice and [abuse](#), and an [enforcement](#) problem. The inescapable fact is that standard practices that cause animal [suffering](#) exist at every stage of a farmed animal's life – including slaughter.

Summary

We welcomed the introduction of mandatory CCTV in slaughterhouses as a first step for improving transparency and accountability. Although it is unclear to what extent, CCTV can perform a role in behaviour change and has potential to help with monitoring abuses and enforcing welfare laws. However, we are still concerned over the prevalence of malpractice, illegal behaviour and unnecessary violence inflicted upon animals in slaughterhouses, as demonstrated by various investigations over recent years by Animal Aid and other organisations. Animal Equality and Animal Law Foundation's recent report into the enforcement of animal protection law highlighted the issue of lack of enforcement. The fact that there is still an enforcement problem when abuse arises at slaughterhouses with CCTV calls into question how thoroughly, if at all, the viewing of such recordings is for such violations to escape notice. If no effective action can be brought against the individuals or company responsible, it diminishes the impact of CCTV.

While mandating the use of CCTV could have positive benefits in terms of deterrence and enforcement, we'd like to emphasise that even routine practice leads to a distressing death for animals in slaughterhouses. No amount of oversight can make killing animals for our food a humane process.