

**Welfare at Slaughter Team**  
**Transforming Farm Animal Health and Welfare Team**  
**Department for Environment Food & Rural Affairs**

17 January 2023

Thank you for providing us with the opportunity to feed into the review of 'The Mandatory Use of Closed Circuit Television in Slaughterhouses (England) Regulations 2018'.

We strongly supported the introduction of 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 (OVs). CCTV remains a useful and necessary tool in helping to ensure that legal requirements are met and high animal welfare standards are maintained.

We have repeatedly highlighted that the requirement for 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.

In our experience, the current legislation is working well overall and has shown to be largely fit for purpose. However, we have identified several areas where refinements could be made to enhance its benefits:

- Extended access by authorised officers: the regulations should be amended to allow authorised officers, other than FSA staff, access to CCTV. In particular, we are aware that Local Authorities have struggled to obtain footage in transport welfare cases. We are therefore supportive of the recent proposals put forward by the Welsh government to allow authorised officers to access footage and would like to see the same principles applied in England.
- Strengthening of the requirement to retain and provide footage on request: We understand that FSA staff have experienced issues with obtaining CCTV footage which has been formally requested by them. Examples of reasons cited why footage became "unavailable" are: the engineer accidentally erased the hard disc, the system caught fire, we had a break in and, the hard disc drive has been stolen. We therefore would like to see a tightening of the requirement to retain and provide footage on request, which should also include adequate enforcement options.

- Assessment of audio: Defra should also assess whether a requirement for audio on CCTV could result in improved animal welfare standards.

As we have 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.

Yours sincerely,

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British Veterinary Association

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Veterinary Public Health Association