

**P-04-433 CCTV in Slaughterhouses –
Correspondence from David Grimsell to Committee, 04.04.18**

Chair of the Welsh Assembly
Petitions Committee

By email

31st March 2018

Dear Chair of the Petitions Committee

re Petition P-04-433 CCTV in Slaughterhouses
Letter for consideration at the forthcoming Petitions Committee meeting
scheduled for the 17th April 2018

1 The welfare of farm animals at the time of their slaughter is a matter of the utmost importance and of great concern to citizens across the U.K. There are Regulations to protect welfare of animals at this time which have been arrived at through democratic process and which citizens have a right to expect are properly monitored and enforced¹.

2 Considerable concerns about welfare standards at slaughter have been raised particularly as a result of a number of fully documented undercover investigations into slaughterhouses in England from 2011 onwards². These found that in 13 out of 14 slaughterhouses investigated that there were significant and frequent breaches of welfare regulations, including mis-stunning, failure to stun and others, as well as many instances of overt cruelty. The investigations were fully documented and relevant photographic and video material from these is available on-line². The video and other footage was systematically reviewed against regulatory requirements and was submitted to the Food Standards Agency (FSA). A number of prosecutions and revocations of licenses in investigated slaughterhouses have followed based on the evidence submitted e.g. ³.

3 In light of this evidence it is incontrovertible that welfare breaches at slaughter are frequent and widespread. It is clear also that the current mechanisms for monitoring welfare standards at slaughter have failed and are not detecting or preventing many such breaches. There is a very evident discrepancy between officially published statistics (eg from official veterinarian, OV, reports) and the actuality of welfare breaches occurring. While the undercover investigations were undertaken in English slaughterhouses there is no basis for assuming that things

are any different in Welsh slaughterhouses. It is, instead, highly likely that there are equivalent problems in Welsh ones.

4 The Welsh Government has been very tardy in seeking to respond to these issues. Its primary response has been to 'commission' a review by self-nominated industry representatives only (ie particularly those from the abattoir sector) referred to as the 'Task and Finish Group'. The Group produced a report which it submitted to the Government⁴. This report recommended that installation of CCTV in Welsh slaughterhouses should not be made compulsory.

5 The report of the Task and Finish Group has been strongly criticised for its poor quality and industry bias. As a concerned Welsh citizen, I submitted a detailed critique of the report to the Welsh Government and supplied copies to Assembly Members (a copy is supplied with this letter). Animal Aid⁵ and the RSPCA⁶ have each also submitted rigorous critiques (n.b. Animal Aid's submission has been previously supplied to the Petitions Committee). The British Veterinary Association (BVA) has been outspoken in its criticism of the report⁷.

6 The industry Task and Finish Group report fails to consider the fully-documented, extensive and publicly available evidence of welfare breaches and cruelty provided through undercover, independent investigations. While the report disregards this, the evidence was formally recognised by the Food Standards Agency (FSA), has been sufficient to be used in a number of successful prosecutions, and when publicly revealed, provided sufficient impetus to most large retail chains in the UK to require that their meat suppliers install CCTV and monitor the footage appropriately.

7 Secondly, ignoring the key relevant evidence (above), the report presumes, instead to rely on very limited data available through official statistics provided by the FSA, which is based primarily on Official Veterinarian (OV) reports. Even this evidence is misrepresented by the Task and Finish Group, which draws inappropriate conclusions from the limited data considered (see footnote).

(Footnote: the report infers that because official statistics show there was a similar, small, number of reports of welfare breaches across all Welsh slaughterhouses with CCTV installed, and those without, that CCTV does not make a difference to detection of welfare breaches. However, the raw data used is not meaningful as it should have been adjusted for the significantly higher throughput of animals (about four times as many animals processed) in

slaughterhouses in Wales with CCTV (in some form) than those without. No such adjustment was made. This failure to adjust is an elementary error and reflective of the poor quality of analysis throughout the report)..

8 The official statistics cannot, however, be relied on, with or without adjustment. The evidence is overwhelming that they do not reflect the number of instances of welfare breaches occurring, and fail entirely to record the many instances of cruelty shown in video footage of the English slaughterhouses investigated. The comparison made by the Task and Finish Group relies also on a crude 'do they have CCTV or do they not' distinction. CCTV may or may not be located appropriately, footage may or not be monitored or reviewed etc.) properly. The Task and Finish Group's undertook no investigation, analysis or assessment of where or how any such CCTV was used. This is surprising in light of their report's pretension to assess the use and value of CCTV in Welsh slaughterhouses.

9 Thirdly, the Task and Finish Group report makes little reference to any outside sources of evidence, reports, papers or other material. The one source their report refers to is the published Opinion of the Farm Animal Welfare Committee (FAWC)⁸. However, the FAWC report is used in a highly selective and misleading way which misrepresents its content and recommendations. For example, the Task and Finish Group Report seeks to imply that the FAWC did not consider CCTV to be of particular value, and that it did not feel it necessary to recommend that CCTV be installed in slaughterhouses. This is far from the truth. The FAWC Opinion highlights a long series of benefits that CCTV is likely to provide, including that of protecting animal welfare. They specifically recommended that all Food Business Operators should install it (see, for example, FAWC Opinion Recommendation 90, '*In order to realise the potential benefits to animal welfare and to businesses identified in this Opinion, FAWC recommends that all approved slaughterhouse operators (Food Business Operators, FBOs) should install CCTV in all areas where live animals are kept and where animals are stunned and killed*').

10 Finally, the Task and Finish Group fails to make any reference to the conclusions and stated recommendations of any of the Food Standards Agency (FSA)⁹, the British Veterinary Association (BVA)¹⁰, or the RSPCA¹¹, each of which strongly supports compulsory introduction of CCTV in all slaughterhouses and have provided arguments for doing so. The Report is more generally of low calibre, with poor quality of argument. It appears throughout to be selectively

biased towards industry-serving conclusions which imply that there are no significant welfare issues in Welsh slaughterhouses and that CCTV is not needed.

11 In 2017, the Welsh Government referred the Task and Finish Group Report to the advisory Wales Animal Health and Welfare Framework Group (WAHWFG). It also referred the critiques supplied by myself and Animal Aid. A critique published by the RSPCA was not, for some reason, considered by it. The advice provided to the Cabinet Secretary by WAHWFG was not made public, and its deliberations were not minuted. However, a copy has been obtained through FOI (copy supplied with this letter).

12 The WAHWFG advice repeated almost verbatim the content of the industry Task and Finish Group report. It made no reference to the content of critiques supplied in relation to it, or to any other criticisms that had been raised externally (e.g. by the BVA and others). The report only states without any further discussion of evidence or criticism that, '*We recognise the very good evidence presented to support the use of CCTV*'. This is simply vacuous.

13 The WAHWFG advice, following the Task and Finish Group Report, does not address at all the extensive, publicly available evidence of widespread welfare breaches revealed by fully-documented undercover investigations. Instead, it presumes to dismiss it stating, '*Much of the evidence countering the statistics presented in the Task and Finish Group report focussed on the alleged situation in England (we would ask the question as to whether these incidences were reported through official channels)*'. This comment seeks to imply that certain sources of clear evidence, without which the welfare problems would not otherwise have been detected, should be ignored. It also seeks to insinuate that the situation in Wales might be anticipated to be different from that evidenced in 13 out of 14 slaughterhouses in England. There is no basis for this. The reference to not '*reported through official channels*' is strange as the documented findings were indeed reported through these, being supplied directly to the FSA in full, and subsequently by the FSA to DEFRA with respect to pursuit of prosecutions arising.

14 The overall import of the WAHWFG advice to the Minister in relation to the Task and Finish Group Report is that,

a) they support '*the aspiration*' for CCTV to be used in Welsh slaughterhouses (p.1)

b) there is '*not sufficient basis upon which to make CCTV a mandatory requirement in abattoirs in Wales*'. (p.2)

c) they, *'recommend effort is focussed on developing, promoting and implementing the voluntary approach'*.(p.3)

d) the problem is not significant because, *'Looking at the evidence provided, all large slaughterhouses in Wales already have CCTV installed. Therefore the majority of animals slaughtered in Wales are already protected in this way'*. (p.4)
(Despite the many hundreds of thousands of animals slaughtered in abattoirs without CCTV).

It is noteworthy that throughout the Task and Finish Group Report, and the WAHWFG advice which mirrors it, that there is no recognition or acknowledgement at all of the extent, frequency or severity of welfare breaches in slaughterhouses (or the evidence that supports this). There appears to be denial and complacency about the need to prevent this. Instead, the reports presume to deflect attention to injuries and problems associated with transport to slaughterhouses, but not occurring within them (eg pp 4 and 5).

15 The WAHWFG advice, like that of the Task and Finish Group itself, is remarkably narrow. It doesn't even consider or reflect the content of the FAWC Opinion. It moreover, fails to reflect:

- ⑩ the specific current view and recommendation of the FSA⁹ that CCTV should be compulsorily installed in all slaughterhouses and the multiple benefits likely to arise from this
- ⑩ the strong recommendation of the British Veterinary Association (BVA)¹⁰ that CCTV should be compulsorily installed with footage available to OVs.
- ⑩ the strong recommendation of the RSPCA that CCTV should be compulsorily installed to protect animal welfare.

16 It is pertinent to note that, while it includes some veterinary representatives, the WAHWFG is heavily meat industry-dominated. That evaluation of the potential arguments for installing CCTV in Welsh slaughterhouses has presumed to be suitably dealt with by firstly a self-nominated abattoir and associated meat-industry group, and subsequently by a meat-industry dominated advisory group is astonishing. It could have been anticipated that the Task and Finish Group, with vested interest in downplaying or denying welfare problems in slaughterhouses, and in avoiding incurring costs and changes to incorporate CCTV, would dismiss relevant evidence and argue for no change. Similarly, this could have been anticipated to be reinforced by an industry-dominated advisory group. And that appears to be precisely what has happened - to the advantage of the industry, but to the risk and detriment of animal welfare.

16 The process followed by the Government to date, can be characterised as follows:

- a) very tardy consideration of the issue of CCTV in slaughterhouses – evidence-based concerns were raised back in 2011. The Government's concern for animal welfare at slaughter has not been evident from this.
- b) to ask the abattoir industry, the subject of criticism of failure to prevent welfare breaches, to itself nominate people to assess the 'value' of CCTV in Welsh slaughterhouses (without a clear or adequate brief and without any independent membership)
- c) to refer an industry-determined report to an industry heavy 'advisory' body whose discussions and review were not made public
- d) to fail to consult with the public on this matter at any point despite this being a matter of widespread public concern that bears on the proper application of welfare at slaughter laws.
- e) to fail to make publicly apparent any of the steps it was taking or the process it was following. (The Petitions Committee itself last requested further information from the Government on April 17th 2017, without response almost a year later). This, despite the fact the process has the potential to lead to introduction of legislation by the Assembly, or its rejection.

18 Since the WAHWFG advice was supplied to the Minister the UK Government has confirmed that it will introduce a requirement in May for CCTV to be compulsorily installed in all slaughterhouses in England within 6 months. A consultation associated with this found that 99% of 4000 respondents supported this. It can reasonably be anticipated that public feeling in Wales is very similar, though the Welsh Government has not consulted the public. The Scottish Government has recently announced its own consultation in relation to proposals to require compulsory installation of CCTV in Scottish slaughterhouses. On the 23rd February 2018 the Welsh Secretary admonished the Welsh Government for failing to yet take action to improve welfare in slaughterhouses and urged it to introduce legislation requiring compulsory CCTV¹².

19 On 22nd March 2018 the Cabinet Secretary, Lesley Griffiths announced that Wales would not be requiring the introduction of CCTV in Welsh slaughterhouses, instead offering general financial support to small and medium Welsh abattoirs, and only hinting at potential future legislation on CCTV. The Cabinet Secretary stated, '*Officials worked closely with a slaughter industry task and finish group which provided a report of recommendations to me last year on ways to improve*

animal welfare at slaughter. The Wales Animal Health and Welfare Framework Group supported the recommendations...’.

20 The Cabinet Secretary’s statement evidences a complete failure to understand the very extensive limitations of the industry Task and Finish Group Report and its rubber-stamping by the industry heavy WAHWFG. It recognises not at all the comprehensive criticisms of the inadequacies of the industry report, a report which demonstrates not the slightest concern or recognition of significant welfare problems in slaughterhouses that has led to legislation in England, and the current consultation in Scotland. It accepts the denial of relevant evidence by the industry, evidence which has shown again and again and again through fully documented undercover investigations that not just a few but likely hundreds of thousands of animals (or more) experience unnecessary suffering or cruelty at the time of their death every year in the UK. The Cabinet Secretary’s Statement evidences in particular disregard for the animals.

21 The Government appears to view the slaughter industry as the only relevant ‘stakeholder’. It is worth remembering that key stakeholders are all Welsh citizens whose views about how animals are treated is highly relevant. Citizens have, amongst other things, a ‘stake’ in legislation relating to slaughter, democratically arrived at, to be properly applied and for their to be mechanisms to ensure that it is. CCTV has an important role to play in this and it urgently requires to be implemented. The most important ‘stakeholders’ though are the animals themselves, who require protection when at their most vulnerable.

21 I exhort Members of the Petitions Committee to press for proper recognition of the welfare harms and risks that exist for animals at the time of their slaughter in Welsh slaughterhouses, and to press for urgent legislation to require implementation of CCTV in ALL slaughterhouses as part of a strategy to prevent these harms. A voluntarist, industry-serving approach is not sufficient particularly where the industry itself denies any problems.

Thank you for your attention.

David Grimsell
Welsh citizen

Sources

1 The Welfare of Animals at the Time of Killing (Wales) Regulations 2014.

Stationery Office Ltd.

https://www.legislation.gov.uk/wsi/2014/951/pdfs/wsi_20140951_mi.pdf

2 Animal Aid.

<https://www.animalaid.org.uk/the-issues/our-campaigns/slaughter/>

3 Association of Lawyers for Animal Welfare (2012)

<http://www.alaw.org.uk/2012/04/slaughterhouse-workers-jailed-after-alaw-intervention/>

4 The Safeguarding Animal Welfare at Slaughter Task and Finish Group (2016) The Need for and Possible Implementation of a Workable System of CCTV in All Slaughterhouses in Wales

<http://politicalanimal.org.uk/wp-content/uploads/2017/07/161222-cctv-in-wales-slaughter-houses-en.pdf>

5 Animal Aid (2017) Animal Aid's Response to The Safeguarding Animal Welfare at Slaughter Task and Finish Group Report on CCTV

<http://www.senedd.assembly.wales/documents/s61485/28.03.17%20Correspondence%20-%20Petitioner%20to%20the%20Committee.pdf>

6 RSPCA Cymru (October 2016) Response to the Safeguarding Animal Welfare at Slaughter Task and Finish Group report: The need for and possible implementation of a workable system of CCTV in all slaughterhouses in Wales.

<http://politicalanimal.org.uk/wp-content/uploads/2017/09/RSPCA-response-to-Slaughter-Task-Finish-Group-report-on-CCTV-in-Welsh-slaughterhouses-July-2017-.pdf>

7 British Veterinary Association (2016) Vets disappointed with recommendations for Welsh slaughterhouse CCTV. 19th December 2016.

<https://www.bva.co.uk/news-campaigns-and-policy/newsroom/news-releases/vets-disappointed-with-recommendations-for-welsh-slaughterhouse-cctv/>

8 Farm Animal Welfare Committee (FAWC) (2015) Opinion on CCTV in slaughterhouses.

<https://www.gov.uk/government/publications/fawc-opinion-on-cctv-in-slaughterhouses>

9 Food Standards Agency Board Meeting 3rd June 2015 – Update on Animal Welfare. Report by Jason Feeney, Chief Operating Officer.

<https://www.food.gov.uk/sites/default/files/fsa150605.pdf>

10 British Veterinary Association (2015) Policy Statement – CCTV in slaughterhouses. July 2015.

https://www.bva.co.uk/uploadedFiles/Content/News,_campaigns_and_policies/Policies/Ethics_and_welfare/bva-position-on-cctv-in-slaughterhouses.pdf

11 RSPCA Cymru (2017) CCTV in slaughterhouses.

<http://politicalanimal.org.uk/topics/wales/cctv-abattoirs/>

12 Office of the Secretary of State for Wales (2018) Welsh Secretary calls on Welsh Government to improve welfare standards in Welsh slaughterhouses. Press Release: 23rd February 2018. <https://www.gov.uk/government/news/welsh-secretary-calls-on-welsh-government-to-improve-welfare-standards-in-welsh-slaughterhouses>

13 Welsh Government (2018) Written Statement – Animal Welfare in the Food Chain 22nd March 2018

<http://www.gov.wales/about/cabinet/cabinetstatements/2018/animalwelfarefood/?lang=en>