



SUMMARY DOCUMENT

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

Animal Aid has deep concerns over the Task and Finish Group's Report, published in October 2016. There are serious flaws in the methodology, including the reliance on a previous report that came to conclusions for which it offered no evidence. Furthermore, the recommendations and conclusions reached overlook or omit key evidence that negates them. One example is the conclusion reached that slaughterhouses already belong to assurance schemes which require additional welfare checks and audits. This is irrelevant since Animal Aid's evidence gives clear proof that those belonging to high welfare audit schemes were no less likely to have staff abusing animals.

We have a deep concern over the clear partiality of the authors, most of whom are from the very industry being regulated, and from whom we have seen encouragement *not* to comply with the regulators. The one independent body within the Group supports mandatory CCTV but was outnumbered and presumably outvoted by the organisations it is supposed to be regulating. And finally, given that this report was intended to safeguard welfare at the time of slaughter, we are surprised that there are no welfare bodies within the Group.

Flawed Methodology

Number of Breaches

The authors studied the 'number and type of welfare incidents reported in Welsh slaughterhouses in 2015' in order to come to its conclusions. But Animal Aid can state with confidence that these 52 reported incidents are the tip of an iceberg since in all years we had (covert) CCTV cameras inside slaughterhouses, we detected thousands of abuses where the regulators recorded just a handful. The Group argues against CCTV on the grounds that there are not many breaches, but it is only CCTV can provide evidence of how many breaches there really are.

The FAWC Report

The Task and Finish Group rely heavily on the FAWC report. FAWC is not independent of industry, being made up in part by farmers and slaughtermen. One opponent of mandatory CCTV is FAWC Member Steve Wotton who is also the FBO of the University of Bristol's slaughterhouse.¹ At the most recent audit of his slaughterhouse (June 2016), the FSA found five major non-compliances and several minor ones. It is not difficult to see why he and the other FBOs do not want greater regulatory scrutiny.

Given the industry's extreme reluctance for greater monitoring, it is unsurprising that the FAWC report stopped short of saying CCTV should be made mandatory. It did however list the overwhelming benefits of CCTV:

‘CCTV offers a range of benefits in slaughterhouses for the observation and recording of real-time processes, for the recording of individual incidents, for contributing information to the auditing of animal welfare, for aiding the verification of slaughterhouse compliance with legislative and assurance or certification requirements and for the training of slaughterhouse staff.

‘CCTV offers the possibility of full-time continuous observation and recording of live animal areas, particularly those where there is a high risk of animal injury or avoidable suffering.

‘CCTV can be an important back-up to physical observation, particularly in those small, confined or high risk areas where physical inspection is limited, for example in a stunning area where there is insufficient room for an observer to see the whole procedure.’

With so many benefits, FAWC’s statement that CCTV ‘did not necessarily lead to better outcomes’ is strange, especially as it could offer no evidence either that CCTV did *not* lead to better outcomes. Besides, CCTV is a tool to both detect and deter crime and poor practice. It is self-evident that with an increase in detected abuse, more abuse can be stopped.

The Task and Finish Group’s criticism that there could be inconsistencies in analysis of footage is only relevant if there is not an independent body dedicated to monitoring it – something that the 2016 University of Sheffield report calls for.ⁱⁱ And in any case, monitoring of CCTV even by each on-site vet would be no more inconsistent than the current system of each vet reporting non-compliances.

Flawed Conclusions

The authors published three conclusions to support the claim that slaughterhouses are well regulated, but in each omit vital information or overlook evidence that shows the current regulatory system has not been effective.

The first is that there are a number of official controls in Welsh slaughterhouses including vets and the Standard Operating Procedures on welfare. But the presence of vets did not stop ten out of eleven slaughterhouses breaching animal welfare laws. Vets cannot be relied upon to be in all places at all times and to see through brick walls. They need tools to help them, which is why the British Veterinary Association supports mandatory CCTV. As for Standard Operating Systems relating to welfare, all slaughterhouses are supposed to have them but six Welsh slaughterhouses – including William Lloyd Williams, one of this report’s authors – failed their most recent audit based on this criterion.ⁱⁱⁱ

The second is that the BMPA and the BPC have published Guides to Good Practice on protecting animal welfare at the time of killing. However, if the law, the presence of a vet and the designation of an Animal Welfare Officer did not stop abuses, it is unlikely an industry Code will do so. Our evidence shows that abusers know the law and what they should be doing, but they wait until they think no one is watching and then break it with impunity. It is our view that Codes will make little difference and certainly should not be relied upon.

The third flawed conclusion is that many slaughterhouses are members of various assurance schemes, such as Red Tractor and Freedom Foods, and these make additional animal welfare requirements and impose additional audits on abattoirs. However, some of the

worst abuse we filmed was at slaughterhouses accredited under high welfare schemes. Cheale Meats (Elmkirk Ltd), where pigs were punched in the face, beaten excessively and burnt with cigarettes was under the RSPCA's Assurance scheme. Two men were jailed as a result of the (covert) CCTV footage that detected their abuse. And of Tom Lang, a slaughterhouse accredited by the Soil Association, the FSA said: 'We acted quickly when we saw these pictures of animal cruelty. We suspended three slaughterers immediately and we're collating evidence to support a potential prosecution of the slaughterhouse operator and slaughterers. We were all shocked by what we saw in the footage.'^{iv} In short, being a member of even the most rigorous audit scheme does nothing to prevent abuse.

The Group singles out specifically the stun / bleed areas and says it does not support the use of CCTV here in particular because 'there are experienced, trained staff who are present and close to the animal, and required to assess the signs of an inadequate stun much more efficiently and quickly than anyone watching on CCTV would be.' What the Group does not take into account is what happens when those trained staff are the ones who are deliberately abusing animals – as was found by Animal Aid's investigations.

Flawed Recommendations

The Group's key recommendation is: 'Based on the number and type of welfare incidents in abattoirs recorded by the FSA in 2015, particularly looking at the split of incidents between abattoirs that already use CCTV and those that do not, and based on the conclusions reached by FAWC in their extensive Opinion, there is simply not sufficient basis on which to make CCTV a mandatory requirement in abattoirs in Wales.'

This is flawed logic on top of flawed logic. Comparing the split of reported incidents between those slaughterhouses that have CCTV and those that don't tells us nothing. It doesn't allow for the discrepancy in the number of slaughterhouses in each group, the throughput of each, the stun / kill method, the species, the presence of a vet, the culture of openness or opaqueness and crucially, it does not tell us if the CCTV was monitored properly or not. Nor does it take into account the deterrent effect of cameras. There are simply too many variables to control for.

In November 2013, Animal Aid discussed with the Minister Alun Davies how to compare the detection rates of slaughterhouses with CCTV and those without. It was agreed then that the only way to do this would be to have covert cameras inside a number of slaughterhouses for a set period, and then make the cameras overt for the same duration. Only then would we be able to compare what happens when workers think they are not being watched and compare it with the same workers when they believe they are being watched. Animal Aid's investigations replicate this. Our footage shows what happens when workers think they are not being watched, and we can compare it to what the FSA, FBO and others saw during that same period. It was Animal Aid's evidence alone that brought the abuses to light, and so it is clear that workers do act differently — and often very badly — when they think they are not being watched.

To reiterate, to simply compare numbers and deduce that the number of incidents in slaughterhouses with and without CCTV were roughly equal is simplistic. But should we go along with the Group's flawed logic, the conclusion it comes to is still wrong. The data it presents shows that 32 incidents were detected where there was CCTV and just 19 where there was none, which indicates that CCTV is doing a good job at detecting problems.

According to these figures, breaches are four times more likely to be detected in slaughterhouses with cameras than in those without, so to then recommend that CCTV is *not* made mandatory based on these figures is extraordinary.

Group Members Show a Clear Bias

The Task and Finish Group is drawn almost entirely from the slaughter industry, and it would have been strange indeed if they had concluded that more stringent regulation was required. The report sets out what they relied upon in order to come to their conclusions. It was not only the flawed figures and the FAWC report (both dealt with above) but crucially *their own experience*. This experience includes advising FBOs *not* to report animal welfare abuses to the regulators if they find them, and to refuse to hand over footage to the FSA when requested.

Instead of asking those being regulated if they would like more regulation, why were the regulators themselves not asked what tools they need? Why was the British Veterinary Association not represented? To omit to include the views of a welfare body is a significant oversight that seriously undermines the credibility of the report. The only independent body represented on this Group was the FSA, whose Chair recently was reported as saying that the 'case for mandatory CCTV has been made'.^v

Conclusion

The authorship of this report, the data it relies upon and the conclusions it draws lack credibility. The report ends by urging action instead on welfare at transport, which of course we support, but this is not an either / or situation and in this context smacks of an attempt to deflect attention away from the poor practices inside slaughterhouses.

The report is flawed, lacks detail and its bias shines through in every word. We would be disappointed if the Minister took action based on this report without taking into account the full weight of evidence available.

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ⁱ <http://www.bris.ac.uk/vetscience/people/stephen-b-wotton/index.html>

ⁱⁱ I Rotherham, J Worden & P Cormack, 'Research Report on CCTV Monitoring in Slaughterhouses', Sheffield Hallam University, August 2016

ⁱⁱⁱ The others are: 2 Sisters Llangefni, Fairfield Meat Company Ltd, Randall Parker Foods, Usk Vale Poultry and St Merryn Foods

^{iv} <http://www.dailymail.co.uk/news/article-1242503/Think-going-organic-lets-eat-meat-clear-conscience-This-shocking-investigation-humane-slaughterhouse-make-think-again.html>

^v <https://www.fginsight.com/news/case-is-made-for-mandatory-cctv-in-slaughterhouses-16960>