



## **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 employed, 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. Omitting the RSPCA and the British Veterinary Association is a clear oversight.

### **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 the 52 reported incidents that the Group studied is the tip of an iceberg since in all the years that 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, when only CCTV can provide evidence of how many breaches there really are.

Between 2009 and 2014, Animal Aid placed (covert) CCTV cameras inside ten English slaughterhouses and found that nine of them were breaking animal welfare laws, many of them very seriously, and many routinely. But without Animal Aid's properly monitored cameras, none of these breaches would have come to light as the vet did not see them, and the Food Business Operators (FBOs) made statements to the media, confirming that they were not aware of these breaches either.

For example:

*'Stephen Lomax, spokesman for Tom Lang Ltd, claims they were unaware of the breaches until the MHS brought it to their attention. He says the abattoir owners were "absolutely*

*mortified” by the scenes filmed in their slaughterhouse’.*<sup>1</sup>

*‘Roy Barber, owner of the abattoir, declined to comment. However, Steve Lomax, of the Association of Independent Meat Suppliers, who acts as his spokesman, said Barber had “not known what was happening”.*<sup>2</sup>

If neither the vets nor the FBO knew what was going on inside these nine slaughterhouses, it is likely to be the same in Welsh slaughterhouses, where the systems of slaughter and regulation are the same. Only with properly-monitored cameras can FBOs and regulators be sure that animals are not being abused.

### **The FAWC Report**

The Task and Finish Group relies heavily on the Farm Animal Welfare Council (FAWC) report. FAWC is not independent of industry, being made up in part by farmers and slaughtermen. One outspoken opponent of mandatory CCTV is FAWC Member Steve Wotton who is also the FBO of the University of Bristol’s slaughterhouse.<sup>3</sup> 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 that may not be in his interest, or those of other FBOs, to want greater regulatory scrutiny.

Given the industry’s extreme reluctance to accept 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 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.

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<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>

<sup>2</sup> <http://www.essexlive.news/slaughterman-tortured-pigs/story-12638129-detail/story.html>

<sup>3</sup> <http://www.bris.ac.uk/vetscience/people/stephen-b-wotton/index.html>

Without cameras, independent monitoring and the will to act on what is found, abuse will continue across the industry, hidden from the regulators. One example of this is at Elmkirk Ltd, a slaughterhouse accredited by the RSPCA.

In defending one of their slaughtermen on trial for burning pigs with cigarettes, solicitor Sundeep Pakhania, said the abuse filmed by Animal Aid was part of a wider culture. 'In the CCTV, you can see another operative walking by, and he mentions nothing,' he said.<sup>4</sup> Animal Aid's (covert) CCTV footage found this to be common - one person commits the abuse; others watch or walk by without acting. Where this culture of cruelty exists, CCTV is desperately needed. Without CCTV, FBOs and the FSA may never know of its existence.

Animal Aid agrees wholeheartedly that CCTV is not a panacea, and has not come across anyone who would claim otherwise. CCTV does have its limitations and could never be expected to replace the existing regulatory framework but it is a hugely useful tool if the footage is independently monitored.

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 Rotherham Report calls for.<sup>5</sup> 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 conclusion 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 nine out of ten 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 one operated by William Lloyd Williams, one of the Group's report's authors – failed their most recent audit based on this criterion.<sup>6</sup>

The second conclusion is that the BMA and the BPC have published Guides to Good Practice on protecting animal welfare at the time of killing.

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<http://www.dailymail.co.uk/news/article-2135083/Animal-cruelty-pair-jailed-caught-stubbing-cigarettes-pigs-faces-hitting-baton.html#ixzz4VGT0Tm8G>

<sup>5</sup> I Rotherham, J Worden & P Cormack, 'Research Report on CCTV Monitoring in Slaughterhouses', Sheffield Hallam University, August 2016

<sup>6</sup> The others are: 2 Sisters Llangefni, Fairfield Meat Company Ltd, Randall Parker Foods, Usk Vale Poultry and St Merryn Foods

However, if the law, the presence of a vet and the designation of an Animal Welfare Officer did not stop abuses, it is unlikely that 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 conclusion that the Group comes to 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 have seen 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.'<sup>7</sup> In short, being a member of an assurance scheme does not prevent abuse.

The RSPCA audit scheme does insist that its slaughterhouses have CCTV but it clearly has not been effectively monitoring it otherwise the abuses would have been detected. Whether this was down to poor practice or whether the FBO hid the footage is unclear. But Animal Aid was told by the FSA that when they asked for the Cheale Meats CCTV footage, it had already been wiped.

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 abusing animals – as was found by Animal Aid's investigations at nine out of ten slaughterhouses?

### **Flawed Recommendations**

The Group's key recommendation is: 'Based on the number and types 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 a 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

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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.

Animal Aid discussed with the Minister Alun Davies how to compare the detection rates of slaughterhouses with CCTV and those without in November 2013. 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. Because it was Animal Aid's evidence alone that brought the abuses to light, 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 even if 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 almost twice as 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 make-up of the Task and Finish Group is surprising. Drawn almost entirely from the slaughter industry, 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 was recently reported as saying that the 'case for mandatory CCTV has been made'.<sup>8</sup>

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

## **AIMS**

The Association of Independent Meat Suppliers (AIMS) represents small and medium-sized red meat slaughterhouses, and its allegiance is very firmly in favour of their business needs, not their animal welfare compliance. Stephen Lomax from AIMS has informed Animal Aid on several occasions that AIMS' advice to FBOs is that if they find a worker breaking animal welfare laws *not* to report him to the FSA but to sack him. Clearly, this causes least bother to the FBO but it does nothing to allow regulators to know what is going on and to take action. Nor does it stop that worker getting a job in a different slaughterhouse.

This is not an isolated incident. AIMS' solicitor Jamie Foster recently advised FBOs *not* to allow the FSA routine access to their CCTV system in order to watch their workers. Clearly, AIMS does not have compliance with animal welfare laws as its principal priority.

These are serious issues. *The Times* revealed in May 2016 that a fifth of slaughterhouses were refusing to hand over CCTV footage when asked to do so by the FSA.<sup>9</sup> With industry advising denying routine access to CCTV footage and without a law to state that FBOs must hand footage over, there is little chance of the true scale of abuse being uncovered.

Moreover, AIMS has a history of blaming vets for the failings inside slaughterhouses, even though legal responsibility lies with the FBO. In one case, the AIMS spokesman blamed government vets for not alerting owners to the "deplorable" abuse found elsewhere. He said: "There's no excuse for all the self-serving arguments the FSA gives about these vets [monitoring abattoirs] not having enough time. They spend a great deal of time phoning their boyfriends, reading the newspaper or filling in useless forms. The system has failed."<sup>10</sup>

Of another investigation, AIMS said: "The company is disappointed the official vet did not notice any problems and had expected any to be drawn to the owner's attention."<sup>11</sup>

AIMS exists to defend its clients and for this reason we would expect it to aggressively oppose mandatory CCTV in order to protect its clients' business interests.

## **BMPA**

British Meat Processors Association (BMPA) fulfils a similar role to AIMS, and the two organisations jointly created their own policy statement on CCTV in November 2015. The wording in this policy document is mirrored in the Task and Finish Group report, and it is clear to see that these two groups have played a lead role in the report's wording.<sup>12</sup> Their own policy states: 'The business operator has sole control over who has access to CCTV footage, including by independent auditors and competent authority representatives.' They further state: 'only authorised personnel should have access to it.' In other words, don't let anyone you don't trust see the footage.

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<sup>9</sup> <http://www.thetimes.co.uk/article/vets-denied-access-to-abattoir-footage-hc7z27qmk>  
<sup>10</sup>

<http://www.independent.co.uk/life-style/food-and-drink/news/supermarket-chain-pledges-cctv-in-abattoirs-to-stamp-out-cruelty-2138180.html>

<sup>11</sup> <http://news.bbc.co.uk/1/hi/england/somerset/8250753.stm>

<sup>12</sup> [http://www.bmpa.uk.com/\\_attachments/Resources/4933\\_S4.pdf](http://www.bmpa.uk.com/_attachments/Resources/4933_S4.pdf)

**National Federation of Meat and Food Traders** takes a similar industry role to AIMS and BMPA, but represents meat traders and butchers. Why they are represented on this Group is unclear.

### **FBOs**

Two small slaughterhouses formed part of the Task and Finish Group. Cig Oen Caron is a small red meat slaughterhouse in Ceredigion. At its last audit, which the FBO knows about well in advance and which therefore should not uncover any breaches / non-compliances, this slaughterhouse failed to reach the required welfare standards in a number of ways.

It did not meet the required standard for cleansing and disinfecting livestock vehicles. And there were concerns over how animals were moved (including the correct procedures and use of instruments to make the animals move). Moreover, its provisions for back-up stunning equipment and its use were inadequate. There were 14 additional concerns over hygiene and food safety, although all were said to be minor.

William Lloyd Williams is another small slaughterhouse but it fared less well at its last audit (August 2016). There was a Major breach relating to competency of staff, and its animal welfare Standard Operating Procedures were not adequate.

Moreover, the structure of the building did not safeguard animal welfare and post-stun monitoring checks were also inadequate. It had an additional 18 breaches / non-compliances relating to food safety and hygiene, three of them classed as Major.

Why two small slaughterhouses, both with welfare problems, were asked to join the Task and Finishing Group when there are others that are bigger, have a better welfare record and crucially have CCTV in place, is unclear.

### **Just One Independent Group Member**

The final and only independent Group member is the FSA, which has said the case for mandatory CCTV has been made. Clearly, it was outnumbered.

### **Animal Welfare Groups**

Despite this being a report on safeguarding animal welfare, no animal welfare bodies were included.

### **Conclusion**

The authorship of this report, the data it relies upon and the conclusions it draws lack credibility. It is a short report, the wording of which mirrors that of the groups who aggressively defend FBOs charged with abusing animals. The report ends by urging action 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.

Without the inclusion of British Veterinary Association, the RSPCA or another welfare body, this report cannot be said to have focused on welfare, which is the proclaimed aim of this endeavour. The report is flawed, lacks detail and its bias shines through.

We would be disappointed if the Minister took action based on this report without taking into account the full weight of evidence available.

***January 2017***