



Llywodraeth Cymru  
Welsh Government

**Number: WG46846**

Welsh Government  
**Consultation – Summary of Responses**

# **Mandatory Closed-Circuit Television (CCTV) in Slaughterhouses**

May 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

## **Overview**

Animal welfare is a priority for the Welsh Government. Our Programme for Government includes a commitment to require closed-circuit television (CCTV) in all slaughterhouses.

We consulted on proposals to require CCTV in all approved slaughterhouses in areas where live animals are present. Our proposals included requirements for slaughterhouse operators to allow enforcement agencies to access footage and requirements for footage to be stored for a specified period.

The 12-week public consultation opened on 14 November 2022 and closed for responses 6 February 2023.

## **Action Required**

This document is for information only. It provides a summary of the responses to the consultation.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

## **Contact details**

For further information:

Animal Welfare Branch  
Office of the Chief Veterinary Officer  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

Email: [animalwelfarewales@gov.wales](mailto:animalwelfarewales@gov.wales)

## **Additional copies**

This summary of response and the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website here: [Closed-circuit television \(CCTV\) in slaughterhouses | GOV.WALES](#)

## Contents

Introduction .....	4
Executive Summary .....	5
Overview of Responses .....	6
The Consultation Questions .....	7
Question 1 .....	9
Question 2 .....	10
Question 3 .....	11
Question 4 .....	12
Question 5 .....	13
Question 6 .....	14
Question 7 .....	15
Question 8 .....	15
Question 9 .....	16
Question 10 .....	16
Next Steps .....	18
Annex 1: List of Respondents (organisations) .....	19
Annex 2: RSPCA campaign response .....	20

## Introduction

We would like to thank everyone who took the time to respond to our consultation. It is not the intent, nor would it be possible, to reflect every comment received in this summary of the responses. The purpose is to give an overview of the responses and give an indication of the kinds of issues and concerns raised in relation to the questions we asked.

Animal welfare is a priority for the Welsh Government. Our Programme for Government includes ambitious commitments to improve animal welfare. One of these is a requirement for closed-circuit television (CCTV) in all slaughterhouses.

Our Animal Welfare Plan for Wales (2021-2026) sets out how we will deliver our Programme for Government commitments, building on the significant progress we have already made to improve animal welfare.<sup>1</sup>

We propose to introduce regulations to require:

- **CCTV cameras be installed in all approved slaughterhouses in areas where live animals are unloaded, kept, handled, stunned and killed.** The cameras must be placed to make sure there is a complete and clear view of all areas of the slaughterhouse where live animals are present and picture resolution must be good enough so people can be identified in the pictures and recorded images. If other CCTV cameras are present on the premises, for example for security or fault-finding reasons, these would not be considered part of the CCTV system for monitoring areas where live animals are present.
- **Recorded images are kept by the slaughterhouse operator for a 90-day minimum period.** This is in keeping with a recommendation from the Farm Animal Welfare Committee.<sup>2</sup> If being used as part of an ongoing investigation or prosecution, recorded images could be kept for longer periods by the relevant enforcement agency.
- **Recorded images should be available to authorised persons to view, copy or seize.** To enable enforcement, authorised officers, such as Official Veterinarians (OVs) from the Food Standards Agency (FSA) and staff from organisations approved by the Welsh Ministers, could be given power of unrestricted access to live or recorded footage for the purpose of monitoring and verifying animal welfare standards in the slaughterhouse.

---

<sup>1</sup> [Our Animal Welfare Plan for Wales 2021-26 \(gov.wales\)](https://gov.wales/our-animal-welfare-plan-for-wales-2021-26)

<sup>2</sup> [Farm Animal Welfare Committee Opinion on CCTV in Slaughterhouses](#)

## Executive Summary

- The twelve-week public consultation on our proposals to require CCTV in all approved slaughterhouses in areas where live animals are present was published on 14 November 2022 and closed for responses on 6 February 2023.
- Respondents were asked to consider 10 questions relating to the proposal specifics, economic impacts on the industry, animal welfare benefits and the impact on the Welsh language.
- There were 16,014 responses to the consultation. This included 15,955 via email and 59 via the online response form. There were 71 individual responses and 15,943 identical email responses received as part of a campaign by the RSPCA. The RSPCA also submitted a separate, substantive response.

For the purposes of this summary, the following analysis is based on the 71 non-campaign responses, which includes the substantive response from the RSPCA. The campaign responses are considered separately:

- 86% of respondents agreed CCTV cameras should be installed in all approved slaughterhouses in areas where live animals are present, including areas where animals are unloaded, kept, handled, stunned and killed.
- 84% of respondents agree with the benefits to animal welfare we have identified from requiring CCTV in all slaughterhouses.
- 74% of respondents agreed with the proposed requirement for slaughterhouse operators to retain CCTV footage for 90-days.
- 84% of respondents agreed there should be unrestricted access to authorised persons to view (in real time and stored), copy or seize recorded images.
- 38% of respondents agreed with our assessment of the cost of mandatory CCTV to individual slaughterhouses and the Welsh slaughter industry. 9% disagreed, with the remaining 53% not providing a yes/no answer or unsure.

RSPCA campaign responses:

- There were 15,943 responses received as part of the RSPCA campaign.
- 100% of campaign respondents agreed CCTV cameras should be installed in all approved slaughterhouses in areas where live animals are present, including areas where animals are unloaded, kept, handled, stunned and killed.
- 100% of respondents agree with the benefits to animal welfare we have identified from requiring CCTV in all slaughterhouses.
- The RSPCA provided a separate and comprehensive response on behalf of the organisation which has been included as part of the non-campaign summary on the following pages.

## Overview of Responses

There were 16,014 responses to the consultation. There were 71 individual responses, 59 submitted via the online portal and 12 by email, and 15,943 identical email responses received as part of a campaign by the RSPCA.

For the purposes of this summary, the analysis is based on the 71 individual responses, which includes a substantive response from the RSPCA.

An example of the RSPCA campaign response is included at Annex 2.

Not all respondents answered every question. Some respondents did not directly answer any of the questions. Where this was the case, and for the purpose of this analysis, the responses have been allocated to the questions where they best fit. In addition, where respondents did answer the specific questions, parts of those answers may have been reallocated to another question where they best fit. Under each question we have provided representative examples of the responses we received.

An overview of the various sectors and organisations which responded is provided below:

Member of the public	48
Slaughterhouse operator	3
Others, including Industry Representative Bodies and Third Sector Organisations	20
<b>Total</b>	<b>71</b>

## **The Consultation Questions**

### **Question 1**

We have made a commitment to require CCTV in all slaughterhouses. Do you agree CCTV cameras should be installed in all approved slaughterhouses in areas where live animals are present, including areas where animals are unloaded, kept, handled, stunned and killed? Please give reasons for your response.

### **Question 2**

Do you agree with the benefits to animal welfare we have identified from requiring CCTV in all slaughterhouses? Please tell us about any other potential benefits to animal welfare.

### **Question 3**

Do you agree with the proposed requirement for slaughterhouse operators to retain CCTV footage for 90 days? Please give reasons for your response.

### **Question 4**

Do you agree there should be unrestricted access to authorised persons to view (in real time and stored), copy or seize recorded images? Please give reasons for your response.

### **Question 5**

Do you agree with our assessment of the cost of mandatory CCTV to (a) individual slaughterhouses and (b) to the Welsh slaughter industry as a whole? Please provide evidence to support your response.

### **Question 6**

Do you consider that the costs of introducing mandatory CCTV in slaughterhouses are reasonable and proportionate for individual businesses, irrespective of size? Please provide evidence to support your response.

### **Question 7**

Are there any other economic benefits or costs not mentioned in the consultation document or Regulatory Impact Assessment? Please explain what these might be and provide evidence to support your response.

### **Question 8**

Are you content for the Welsh Government to contact you for further clarification of the financial impacts that you have estimated?

### **Question 9**

Please consider and outline the effects (whether positive or adverse) that our proposal to require CCTV in all slaughterhouses would have on:

- Opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language.
- How the policy under consideration could be formulated or revised so that it would have positive effects or increased positive effects.
- Opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language.
- How the policy under consideration could be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects on opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language.

### **Question 10**

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please let us know.



## Summary of Responses by Question

**Question 1** - We have made a commitment to require CCTV in all slaughterhouses. Do you agree CCTV cameras should be installed in all approved slaughterhouses in areas where live animals are present, including areas where animals are unloaded, kept, handled, stunned and killed? Please give reasons for your response.

Seventy respondents answered this question. The majority (86%) agree with our proposals to require CCTV in all areas of slaughterhouses where live animals are present. Benefits identified by respondents include improved welfare of animals throughout the slaughter process by ensuring compliance with animal welfare regulations and contributing evidence for enforcement action.

Six respondents (9%) disagree with our proposals. Reasons given include disproportionate costs for some of the smaller slaughterhouses and the existing requirement for an Official Veterinary Surgeon to be present, so CCTV is not needed.

Four respondents (5%) either did not know or did not answer this question.

Please also see the RSPCA campaign response to this question at Annex 2.

Examples of the responses we received:

*'The RCVS supports the Welsh Government commitment to improve animal welfare, including to require all approved slaughterhouses to install CCTV where live animals are present, including areas where animals are unloaded, kept, handled, and killed. CCTV is important to ensure that animal health and welfare standards are being upheld at all times by those working in slaughterhouses. This presence of CCTV would help to ensure this by improving the observation and verification of the proper unloading, handling, keeping and stunning of animals.'* (Royal College of Veterinary Surgeons)

*'I believe this is paramount to ensuring the welfare of all Livestock up until the point of kill. CCTV enables trained animal welfare operators to monitor animals that are lairaged overnight and is a valuable tool to ensuring all procedures are followed.'* (Food Business Operator)

*'CCTV footage is a welcome tool in the upkeep of animal welfare at slaughter. As described in the published material associated with this consultation, the requirement will also include that "cameras must be placed to make sure there is a complete and clear view of all areas of the slaughterhouse where live animals are present and picture resolution must be good enough so people can be identified in the pictures and recorded images." This additional requirement will ensure the recordings are useful as a tool for the OV [Official Veterinarian] and AWO [Animal Welfare Officer], as well as slaughterhouse staff.'* (Humane Slaughter Association)

*'Whilst NFU Cymru believe that CCTV can be highly beneficial in abattoirs we believe that for smaller units the cost will be disproportionate. As stated by Welsh Government in the introduction to the consultation its aim is to protect animal welfare and provide evidence if needed of high standards of care. NFU Cymru and the livestock industry in Wales will totally concur with that. The reality, in practise, is that the work of the*

*camera is, in small abattoirs effectively carried out by an Official Government Veterinarian (OV) who is a qualified independent Government official and does oversee all areas where animals are unloaded, kept, handled, stunned and slaughtered. Any unacceptable welfare practise is immediately sorted out then and there with the abattoir operators followed by a written report and warning if required. Therefore, we strongly suggest that if CCTV becomes mandatory, where it can be independently verified by an operating OV at a small plant, that they are totally satisfied that operations on each slaughter day do not compromise slaughter in any way there should be an exemption built in. Profit margins are for many abattoirs extremely tight and in particular our small throughput ones. We fully realise that good welfare of animals has to supersede business profit considerations, but welfare would not be compromised by building in the suggested optional exemption for those businesses we outline above. The reality is that some of the smaller abattoirs in Wales could decide not to carry on with the business if more costs are piled on the business. This would have a serious detrimental impact on Welsh Livestock producers, the ability to build short, added value, local food supply chains. It would also result in more animals needing to travel longer distances to be slaughtered. There can often be good animal welfare reasons why certain animals should be slaughtered as near as possible to the farm that they originate from. We can see a case for CCTV to be used in small abattoirs if the use of the camera would result in cost savings to abattoir operators in relation to the time and presence of Official Veterinarian costs at all elements of the slaughter line but from the consultation Welsh Government are not proposing this to be the case.’ (NFU Cymru)*

**Question 2** - Do you agree with the benefits to animal welfare we have identified from requiring CCTV in all slaughterhouses? Please tell us about any other potential benefits to animal welfare.

Sixty-eight respondents answered this question. The majority (84%) agree with the benefits to animal welfare we have identified. Other benefits identified by respondents include CCTV contributing to the training of staff involved in animal handling and slaughter and as a useful tool in identifying (and subsequently solving) problem areas or routines.

Four respondents (6%) do not agree with the benefits to animal welfare we have identified. Reasons given include small slaughterhouses working at a slower pace, therefore animals are not rushed through the process. One respondent asked who is monitoring the animals throughout their lives, on farm, at market and during transport, highlighting there is no requirement for CCTV coverage in these places.

Seven respondents (10%) either did not know or did not answer this question.

Please also see the RSPCA campaign response to this question at Annex 2.

Examples of the responses we received:

*‘CCTV will ensure the prevention of cruelty and poor practice in slaughterhouses and other places where animals are slaughtered or may have to be killed. Regulations set down specific requirements which are aimed at preventing the offence of causing any*

*animal avoidable excitement, pain or suffering at a slaughterhouse. Monitoring this period serves as a deterrent for potential transgressors.’ (Shechita UK)*

*‘The FUW agrees with the benefits identified; including providing evidence of compliance, protecting against unfounded and unevidenced allegations of malpractice, tools for training staff and increasing public trust. Several members commented that mandatory CCTV should increase consumer confidence in Food Business Operators (FBOs) and should ensure that such FBOs are conducting all reasonable steps to ensure high standards of animal welfare. Several respondents suggested that increasing confidence in animal welfare would further enhance and safeguard the consumer ‘gate to plate’ experience. The FUW agrees that slaughterhouses create a negative externality on other slaughterhouses when they abuse animal welfare and when this generates wider adverse reputational costs applying to the whole sector including the compliant majority.’ (Farmers’ Union of Wales)*

*‘We agree of the stated benefits of requiring CCTV. However, we again highlight the impact on animal welfare of losing smaller, local abattoirs on the livestock through additional costs of such a requirement. If Welsh Government did make CCTV mandatory throughout abattoirs across Wales there must be financial support for those smaller slaughterhouses whose viability will be affected. Alongside specific support to implement CCTV systems and effective management, Welsh Government and indeed UK Government must implement a strategy that both maintains existing local abattoirs and looks to increase the numbers to support local food systems in the face of the many challenges the meat sector faces. The use of CCTV in smaller-scale abattoirs could have additional benefits on their viability. In specific circumstances the use of CCTV could be used in mobile slaughterhouses where it may be more difficult to have Official Veterinarians present.’ (Country Land and Business Association Cymru)*

**Question 3** – Do you agree with the proposed requirement for slaughterhouse operators to retain CCTV footage for 90 days? Please give reasons for your response.

Seventy respondents answered this question. The majority (74%) agree with our proposed requirement for slaughterhouse operators to retain CCTV footage for 90 days. Reasons given include the need for footage to be kept for a reasonable length of time in case it is needed to support investigations.

Eleven respondents (16%) do not agree with our proposed requirement. Some made alternative suggestions, including retention of footage for less than 90 days and up to five years, citing hardware properties within the cameras along with data protection concerns as some of the reasons why 90 days may not be suitable.

Seven respondents (10%) either did not know or did not answer this question.

Examples of the responses we received:

*‘Members agreed with the proposed requirement for slaughterhouse operators to retain CCTV footage for 90 days from the date taken. Ninety days was deemed appropriate as it is akin to the requirements for footage retention in both England (2018) and Scotland (2021). Having uniform requirements should aid compliance and*

*reduce bureaucracy for those FBOs with sites on more than one devolved administration. In addition to the above, members committed that 90 days should be more than sufficient to ensure that footage is made available for all necessary investigations.’ (Farmers’ Union of Wales)*

*‘CCTV installation has been a requirement within the RSPCA farm animal welfare standards – as used by the RSPCA Assured scheme – since 2011. It is a requirement within the standards that recorded CCTV footage is retained for a period of at least three months.’ (RSPCA)*

*‘We would welcome the requirement for slaughterhouse operators to retain CCTV footage for 90 days. CCTV footage can provide key evidence when wrongdoing has taken place within the slaughterhouse.’ (Animal Aid)*

*‘No, CCTV footage is subject to the Data Protection Act (DPA) which not just includes written details about someone but also pictures and videos that can be used to identify them. It is, however, a huge responsibility to keep the recorded footage safe and delete it after a certain time. Generally, 31 days is the time that most CCTV users keep their recorded footage. This is also recommended by the police. 31 days is ample time for the authorities to retrieve the video in the event of an alleged offence. It is also mentioned in the Information Commissioner’s Office’s (ICO) CCTV code of practice that data should not be retained for longer than necessary.’ (NFU Cymru)*

**Question 4** - Do you agree there should be unrestricted access to authorised persons to view (in real time and stored), copy or seize recorded images? Please give reasons for your response.

Seventy respondents answered this question. The majority (84%) agree that authorised personnel should have unrestricted access to the footage. Reasons given include unrestricted access to recorded images being vital for ensuring footage can be meaningfully used for evidential purposes, and for there to be a sense of transparency and accountability. However, some concerns included whether the nuances of the slaughter process are potentially not fully understood by the general public, and therefore recorded images should not be subject to Freedom of Information requests.

Three respondents do not agree that authorised personnel should have unrestricted access to the footage.

Nine respondents either did not know or did not answer this question.

Examples of the responses we received:

*‘This will ensure that use of the CCTV is transparent, and this will instil public confidence. CCTV footage is crucial in terms of bringing forward enforcement and prosecution based on the data supplied.’ (Veterinary Surgeon)*

*‘In principle there should be no reason why authorised persons cannot view CCTV images from abattoirs at any point in time. The key issue is ensuring only authorised persons are able to access the images. There are various lobbies that would wish to use images from slaughterhouses in their lobbying material (even if the material shows*

*completely legal activity) against the meat industry. We argue these organisations must be prevented from doing so by having robust mechanisms in place around who can access, copy and share such images.'* (Country Land and Business Association Cymru)

*'If CCTV coverage is to be made compulsory as seems to be the government's want then I see no difference in allowing a person authorised to oversee the slaughter process live and watching it on screen.'* (David Huw Evans, Cig Oen Caron)

*'Those with authority that are allowed to get access to any footage need to be clearly defined in the legislation, the individuals suitably trained and authorised to understand the working of an abattoir and the footage they are witnessing and must have a bona fide reason for doing so as defined in their job description.'* (NFU Cymru)

**Question 5** - Do you agree with our assessment of the cost of mandatory CCTV to (a) individual slaughterhouses and (b) to the Welsh slaughter industry as a whole? Please provide evidence to support your response.

Sixty-seven respondents answered this question. Twenty-seven (38%) respondents agree with our assessment of the costs. In agreeing with our assessment, some believe the costs would present a challenge to smaller slaughterhouses but can be justified by the animal welfare and industry gains. Six (9%) respondents disagree with our assessment of the costs. Some consider our cost estimates to be too low and recommend there should be further analysis to better estimate the costs.

Seventeen (23%) respondents answered this question but did not provide a 'yes' or 'no' answer.

Twenty-two (30%) respondents either did not know or did not answer this question.

Examples of the responses we received:

*'The assumptions in the IA seem reasonable. Whilst the cost of installation may be a hurdle for the smaller abattoirs, this is outweighed by the benefits it gives.'* (RSPCA)

*'The costs set out in the impact assessment seem low and we assume are based on the lowest-cost analogue cameras. Having made a number of enquiries, an installation figure of £7,000 for a modern six-camera system with three months storage capacity seems more realistic. Additional coverage for existing systems will vary according to the age and type of system in place. Analogue systems may well only cost around £500 per additional area, but modern digital systems may cost up to £1,500 per additional area, according to our sources. More recently it has been estimated that costs may range from £3,000 to £10,000 depending on the size of the operation.'* (Humane Slaughter Association)

*'Small slaughterhouses have already closed due to rules and regulations - farmers have now need to travel excessive mileage to slaughterhouse - Carbon footprint.'* (Industry Official – no name provided)

**Question 6** - Do you consider that the costs of introducing mandatory CCTV in slaughterhouses are reasonable and proportionate for individual businesses, irrespective of size? Please provide evidence to support your response.

The majority (58%) of respondents agreed that the costs of introducing mandatory CCTV for individual businesses are reasonable. Reasons given include the installation of CCTV has been demonstrated to be economically viable in England. One responded referenced a research report carried out by a team of independent experts headed by Sheffield Hallam University Professor Ian Rotherham which established the use of CCTV in slaughterhouses to be 'cost effective and feasible'.<sup>3</sup>

However, some concerns were raised that if the installation and running costs result in the closure of some of the smaller premises resulting in, among other things, longer journeys for livestock, then this could be counter-productive in some instances and potentially have a net negative-effect on animal welfare.

Seven respondents do not agree that the costs of introducing mandatory CCTV for individual businesses are reasonable.

Twenty-three respondents either did not know or did not answer this question.

Examples of the responses we received:

*'Whilst Conservative Animal Welfare Foundation does not have access to the individual profit and cashflow data of slaughterhouse owners and operators, we agree that the costs quoted in the briefing for this Consultation do seem reasonable and proportionate for individual businesses, irrespective of size (an initial one-off cost of £2,500 for premises without CCTV and £500 per additional area without coverage in plants with CCTV at present). Of relevance is that size and scale of operators in Wales cited in this Consultation, and the fact that they already have CCTV installed: In Wales, 95% of sheep are slaughtered in three premises, all of which have CCTV, 96% of cattle are slaughtered in three premises, all of which have CCTV, and 98% of poultry are slaughtered in three premises with CCTV. This leaves only operators accounting for just 5% of sheep, 4% of cattle and 2% of poultry that would need the additional initial investment of £2500.'* (Conservative Animal Welfare Foundation)

*'We recognise the monetised costs to slaughterhouses to install CCTV, as well as costs to maintain CCTV systems and store footage. However, we believe the extent of non-monetised benefits to a breadth of stakeholders – animals, OV's, slaughterhouse staff, the public and FBOs themselves – justifies any expenditure.'* (British Veterinary Association)

*'No, as clearly, they are not. We cannot overemphasise the importance in Wales of slaughter capacity and the right mix of small medium and large abattoirs are needed to meet market needs for both red and white meat.'* (NFU Cymru)

*'The cost to a small abattoir such as ourselves will be excessive compared to the larger operators who in any case favour a CCTV installation for security purposes.'* (David Huw Evans, Cig Oen Caron)

---

<sup>3</sup> [Research Report on CCTV Monitoring in Slaughterhouses](#)

**Question 7** - Are there any other economic benefits or costs not mentioned in the consultation document or Regulatory Impact Assessment? Please explain what these might be and provide evidence to support your response.

Twenty-four (34%) respondents answered this question.

Further benefits identified included:

- Being able to be part of assurance schemes, such as RPSCA Assured and Soil Association Certification, which have extensive animal welfare requirements and command a premium price in supermarkets.
- To demonstrate and evidence our high welfare standards to international customers or when negotiating trade deals.

Additional costs identified included:

- Maintenance and routine cleaning of cameras in what are harsh environments.
- The possibility of cameras requiring upgrading if found to not produce images of sufficient quality for accurate viewing and analysis.

Examples of the responses we received:

*‘One aspect that needs to be considered is the reputational impact of covert filming operations on the industry. Although it is acknowledged that mandatory CCTV will not prevent all animal welfare breaches taking place, it is hoped that increased transparency and effect use of CCTV for monitoring will enhance welfare and reduce the number of covert operations. Equally, UK nations need to be able to demonstrate and provide evidence of our high welfare standards to compete in global markets and when negotiating international trade deals.’* (Veterinary Surgeon – no name provided)

*‘There is a potential cost of not installing CCTV via loss of public and consumer confidence, which could have a negative economic impact on the industry via adverse reputational costs and loss of business.’* (RSPCA)

*‘The RIA fails to adequately recognise the importance of smaller abattoirs in rural Wales. Not only are they important rural employers but provide a service to the communities and local farms they serve and the benefits that short supply chains bring, a concept championed in Welsh Government’s food policies.’* (NFU Cymru)

**Question 8** - Are you content for the Welsh Government to contact you for further clarification of the financial impacts that you have estimated?

Thirty-six (50%) respondents said they are content for the Welsh Government to contact them for further details and evidence on the financial impact of our proposals.

**Question 9** - Please consider and outline the effects (whether positive or adverse) that our proposal to require CCTV in all slaughterhouses would have on:

- Opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language.
- How the policy under consideration could be formulated or revised so that it would have positive effects or increased positive effects.
- Opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language.
- How the policy under consideration could be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects on opportunities for persons to use the Welsh language, and on treating the Welsh language no less favourably than the English language.

Thirty (42%) respondents answered this question. The majority said they thought it unlikely that the proposals would have any direct impact on the Welsh Language.

Examples of the responses we received:

*‘Many of our abattoirs are in rural Wales, the heartland of the Welsh Language. A high proportion of the staff in the smaller abattoirs are first language Welsh speakers hence we must take every opportunity to ensure that these abattoirs many of them run by local families going back decades, remain as viable businesses.’ (NFU Cymru)*

*‘The CLA policy on Welsh language is that the Welsh language should be used in a positive capacity not in a negative or discriminatory capacity. Where there is legitimate value to be added to a business operation through use of the Welsh language or there is a desire from the owner / land manager to conduct business through the Welsh language then this should be encouraged and supported. People who do not wish to do this should not be treated negatively.’ (Country Land and Business Association Cymru)*

**Question 10** - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please let us know.

Eighteen (25%) respondents answered this question.

Examples of the responses we received:

*‘We are concerned that although the consultation mentions 2 options it then goes on to say Business as usual which is option 1 ‘is not an option.’ Members have rightly therefore questioned if this is a true consultation? If the decision is taken to move forward with this proposal, despite the points we have raised above, then we would urge Welsh Government to re-introduce a time limited grant aided CCTV installation small abattoir scheme. We would also suggest that if the decision is taken to move forward with this proposal then all options must be considered as to how the CCTV could be proactively used to reduce OV costs given that the CCTV could replace some of the requirement for an OV to be present at small abattoirs.’ (NFU Cymru)*



*'We welcome Welsh Government's proposal to introduce mandatory closed circuit television (CCTV) in all slaughterhouses as an additional safeguarding measure under the Animal Welfare Act 2006. We support the introduction of mandatory CCTV in all areas where live animals are kept, handled, stunned or killed in slaughterhouses, with unrestricted access to CCTV footage for Official Veterinarians (OVs) and other enforcement officers. However, it is important to reiterate that CCTV footage checks are a valuable additional enforcement measure and must not reduce or replace the physical monitoring and verification of animal welfare and meat hygiene requirements that OVs currently undertake.'* (British Veterinary Association)

*'Data published in the regulatory impact assessment relating to the number of slaughterhouses already operating CCTV in some capacity suggests to us that the mandating of CCTV in slaughterhouses should be implementing as soon as possible.'* (Animal Aid)

*'Although it is understood that non-stun slaughter has only been carried out in a few Welsh slaughterhouses, there should be some enhanced requirement for CCTV recording operations at slaughter in these situations.'* (Wales Animal Health and Welfare Framework Group)

*'Two issues that come to mind are:*

- 1) Will complementary audio be a requirement?*
- 2) What is the Welsh Government's view on the potential use of artificial intelligence systems, such as those now in use in the Netherlands?'* (Humane Slaughter Association)

*'One issue you have not addressed directly is how the installation of the CCTV and the required additional equipment will be funded. Should this be made compulsory, will we receive a grant toward the initial capital cost at least and a remuneration toward maintenance costs. This could be made from the levy payments that we make to Hybu Cig Cymru both directly and collecting from producers on their behalf. Could I suggest an initial payment of £7000 to cover capital costs and a retention of somewhere in the region of 10% per month - in our case this would amount to about £50 per month which would cover maintenance costs. Unless there is a rural payment grant which would be applicable. Should there be a failure of some kind in the CCTV coverage will this mean we are not allowed to proceed with the slaughter process until it is restored? Being in a rural area it may take a day or two to get a repair engineer on site which will cause stress to the animals already on site.'* (Slaughterhouse Operator)

*'Similar steps should be considered in relation to the movement of animals from farms to slaughterhouses. In addition, similar measures should apply to the rearing and slaughter of all types of farm birds.'* (Member of the Public)

*'Slaughterhouses used to be and should again be local to the animals in question. The practice of loading them onto lorries and hauling them great distances is barbaric and should be addressed as a major welfare issue.'* (Member of the Public)

## **Next Steps**

All responses to the consultation have been analysed with the majority of respondents supporting our proposals. An RSPCA campaign provided a further 15,943 responses in favour, which have been noted, but not considered as part of the detailed analysis contained in this summary.

We will now develop regulations to deliver on our commitment to require CCTV in all slaughterhouses. We will take into account the responses to the consultation as we develop the specifics of our proposals.

## **Annex 1: List of Respondents (organisations)**

Animal Aid  
Animal Law  
British Veterinary Association  
Conservative Animal Welfare Organisation  
Country Land and Business Association Cymru  
Farmers' Union Wales  
Humane Slaughter Association  
National Farmers' Union  
Royal College of Veterinary Surgeons  
RSPCA  
Shechita UK  
Wales Animal Health and Welfare Framework Group

## **Annex 2: RSPCA campaign response**

*Dear Consultation Co-ordinator, Animal Welfare Branch,*

*As an advocate of animals, I am delighted that the Welsh Government has announced a consultation for the introduction of mandatory CCTV in slaughterhouses in Wales, which will help to prevent unnecessary suffering for the tens of thousands of farm animals slaughtered in Wales each year and finally bring Wales in line with the same standards as England.*

*Both myself and the RSPCA are supporters of the introduction of CCTV in slaughterhouses and is something that has been long called for. By making CCTV compulsory in abattoirs it helps to protect and safeguard the welfare of animals at the time of slaughter right across Wales. CCTV has been a requirement in slaughterhouses in England since 2018 and reports since show that this has increased oversight and enforcement of animal welfare standards in the past four years.*

*Question 1: We have made a commitment to require CCTV in all slaughterhouses. Do you agree CCTV cameras should be installed in all approved slaughterhouses in areas where live animals are present, including areas where animals are unloaded, kept, handled, stunned and killed?*

*Yes, In 2017 there were 26 abattoirs in Wales, of which eight abattoirs used CCTV to monitor areas where live animals are handled. By 2022, 17 of the 23 abattoirs surveyed had CCTV in place which shows a positive direction of travel.*

*In 2015 official veterinarians on site reported 52 breaches of animal welfare in abattoirs. Of these 52 abattoir related cases, 32 were in plants with CCTV and 20 without, including 11 relating to the stun and kill. By 2022, 10% of enforcement action by the Food Standards Agency on infractions in abattoirs were undertaken using CCTV footage showing its use as an enforcement tool.*

*The use and installation of CCTV has been proven a success in both assurance schemes and when mandated by Governments. Installation has been a requirement within the RSPCA farm animal welfare standards - as used by the RSPCA Assured scheme - since 2011, and has been a recommendation within the standards since they were first developed in 1994.*

*Question 2: Do you agree with the benefits to animal welfare we have identified from requiring CCTV in all slaughterhouses?*

*Yes, both myself and the RSPCA believe that there are several main reasons why installing CCTV is beneficial:*

- 1- It helps to address public concern by improving assurance and transparency and adding an additional level of assurance and transparency to the slaughter process.*
- 2- To improve access to footage by authorised officers to safeguard animal welfare.*
- 3- To improve enforcement action on sites not cooperating with standards.*
- 4- To ensure universal adoption: mandatory CCTV was introduced in England in 2018 and Wales should now follow suit.*

*I believe that mandatory CCTV should lead to improved compliance by the sector, which may support improved public confidence and improved consumer confidence that welfare standards are being delivered.*

*Thank you for putting forward this consultation, please count this as an individual response in favour of the introduction of mandatory CCTV in Wales. I am proud of our animal welfare standards in Wales, and truly hope we can bring our own farm animal standards in line with those in England, and not be left behind.*