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#### PUBLICATION

# Mandatory Closed-Circuit Television (CCTV) in Slaughterhouses: regulatory impact assessment

An assessment of mandatory closed-circuit television in slaughterhouses.

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# Introduction

The Welsh Government has made a commitment to require closed-circuit television (CCTV) in all slaughterhouses. The policy objective and intended effects are to improve animal welfare in slaughterhouses and provide assurance that all slaughterhouses are operating to high welfare standards. This will be achieved by the mandatory installation of CCTV in all approved slaughterhouses in areas where live animals are unloaded, kept, handled, stunned and killed, with the Food Standards Agency (FSA) having access to CCTV footage, the Slaughterhouse Operator being required to store footage for a specified period, and footage being available for auditing purposes and having evidential status.

Our larger slaughterhouses, which process the vast majority of animals, already have CCTV. Whilst CCTV is not currently mandatory in slaughterhouses in Wales, in January 2022 the FSA carried out a survey on behalf of Welsh Government to assess the current CCTV facilities in every slaughterhouse in Wales. The survey found:

- 23 slaughterhouses were surveyed (one of the premises surveyed has been non-operational since July 2021).
- 17 slaughterhouses have some form of CCTV in place (including all poultry slaughterhouses).
- Six slaughterhouses have no CCTV (all red meat).
- Of the 17 slaughterhouses that have CCTV, 10 have setups that would comply with the existing England<sup>[1]</sup> ([#\\_ftn1](#)) and Scotland<sup>[2]</sup> ([#\\_ftn2](#)) regulations (where CCTV is mandatory), and our proposals.

Some of our larger slaughterhouses adhere to a voluntary protocol jointly developed and agreed between the FSA and industry bodies to enable Official Veterinarians (OVs) to access recorded footage. Whilst CCTV cannot replace direct oversight by slaughterhouse management or OVs, particularly in very

small premises, it can provide objective supporting evidence of the work in each establishment. For this reason, we will require all slaughterhouses to install and operate CCTV in all areas where live animals are present.

CCTV in areas where live animals are present will improve the efficiency of monitoring and enforcement activity, by providing OVs with information they need more readily and more conveniently. FSA enforcement data<sup>[3]</sup> (#\_ftn3) for 2020/21 indicates that at least 10% of slaughterhouse non-compliances are identified either by live or retrospective CCTV viewing and CCTV is routinely used as evidence to support enforcement action.

A 12-week public consultation is accompanying this assessment which, whilst confirming the commitment to require CCTV in all slaughterhouses during this Government's term, is seeking to obtain further evidence and opinion on the impacts of this commitment and implementation.

Those who may have an interest include: Slaughterhouse operators; other trade representatives in the livestock and meat industries; the veterinary profession; animal welfare organisations; animal welfare enforcement bodies; farm assurance schemes; and retailers.

**[1]** (#\_ftnref1) **The Mandatory Use of Closed Circuit Television in Slaughterhouses (England) Regulations 2018 (legislation.gov.uk)**

(<https://www.legislation.gov.uk/ukxi/2018/556/made>)

**[2]** (#\_ftnref2) **The Mandatory Use of Closed Circuit Television in Slaughterhouses (Scotland) Regulations 2020 (legislation.gov.uk)**

(<https://www.legislation.gov.uk/sdsi/2020/9780111046654>)

**[3]** (#\_ftnref3) Food Standard Agency – Business Committee Meeting Animal Welfare Update: **Board Paper Template 2020 inc checklist (food.gov.uk)**

(<https://www.food.gov.uk/sites/default/files/media/document/fsa-21-09-15-animal-welfare.pdf>)

# Options

We have a Programme for Government commitment to require CCTV in all slaughterhouses during this Government's term.

- **Option 1.** Business as usual – under this option, there would be no requirement for slaughterhouses to have CCTV installed on their premises.
- **Option 2.** Mandatory installation of CCTV in all approved slaughterhouses in areas where live animals are unloaded, kept, handled, stunned and killed.

## Costs and benefits

### Option 1. Business as usual

This is the baseline option and there would be no additional costs or benefits associated with this option. We have a Programme for Government commitment to require CCTV in all slaughterhouses during this Government's term. 'Business as usual' is not an option.

## **Option 2. Mandatory installation of CCTV in all approved slaughterhouses in areas where live animals are unloaded, kept, handled, stunned and killed.**

### **Cost to slaughterhouses**

The Welsh Government does not hold information on the cost to slaughterhouse operators of the installation and ongoing maintenance of CCTV systems. However, data from 2017 supporting the consultation by the Department for Environment, Food and Rural Affairs<sup>[1]</sup> (#\_ftn1) estimated the following direct costs may fall to the slaughterhouse industry in aggregate. These figures should be viewed as illustrative estimations. They aim to provide an estimated order of magnitude. The consultation exercise will seek to obtain more evidence on these costs.

### **One-off direct costs**

The total costs are not easily quantifiable and will depend on the size and layout of each slaughterhouse.

We estimate the total capital cost of new CCTV installation to be in the region of £20,000 across the sector<sup>[2]</sup> (#\_ftn2). For slaughterhouses with no CCTV we have assumed an estimated one-off cost of around £2,500. For slaughterhouses with partial CCTV coverage we have assumed an estimated one-off cost of around £500 per additional area without coverage now. We may assume that CCTV equipment has a 10-year life span and so replacement costs are not considered as part of this assessment.

## **Ongoing direct costs**

We estimate the cost of daily oversight and maintenance of CCTV across slaughterhouses in Wales to be around £6,000 per annum. This is based on: An assumption that it takes on average 30 mins/day to check CCTV cameras and that they are positioned and operating correctly; FSA data on the operating hours of slaughterhouses; hourly pay data for those involved in the processing and preparation of food (Annual Survey of Hours and Earnings 2021<sup>[3]</sup> (#\_ftn3)). 30% is added to cover costs like employer NI contribution, pension contribution, holiday pay etc.

In addition, annual maintenance costs to the slaughterhouses are estimated to be around £1,000 based on assumed annual service charge of 5% of the initial capital value of the additional CCTV equipment.

We estimate that storage costs for CCTV footage may be around £220. This is based on a maximum estimated annual cost of £25 per year/slaughterhouse for those without any CCTV in place currently and an additional £10 per year/area for those slaughterhouses where current CCTV coverage is partial. This is calculated on the basis that 90 days of CCTV footage from 5 cameras would require approximately 2TB of storage.

We estimate that other ongoing operating costs to slaughterhouses, such as electricity are likely to be minimal, for example up to around £1,000 per year.

In summary we estimate that the total direct ongoing costs to slaughterhouses may be around £8,000 per year.

## **Public Sector costs**

The implementation and enforcement of these regulations will not constitute

additional costs for Local Authorities. There will be a small implementation cost to the Welsh Government in developing guidance for the slaughter industry which will be produced in collaboration with the FSA. Costs to communicate the implementation date and roll out plans will also fall to Welsh Government. The overall expenditure is not expected to exceed £5,000. There are unlikely to be any cost-savings of significance. Members of the public and third sector organisations have lobbied the Welsh Government for the introduction of mandatory CCTV for a number of years. Responding to regular correspondence on this subject is time consuming. Correspondence is expected to reduce significantly once installation of CCTV in approved slaughterhouses becomes mandatory. There will be an increase in the Welsh Government's funding to the FSA to carry out monitoring and enforcement activities, with the total unlikely to exceed £20,000 per annum. There is unlikely to be any perceptible additional costs to Police Forces in Wales and minimal or no impact on the justice system.

## **Benefits**

As a result of more comprehensive and more accessible CCTV coverage, we expect there would be behavioural change on the part of slaughterhouses which may not be currently fully compliant with existing requirements. We do not expect this to apply in relation to slaughterhouses which are currently fully compliant. In particular we consider that there should be an improvement in slaughterhouse practices, leading to better compliance, i.e. that these CCTV reforms should have a preventive and deterrent effect. The policy should therefore have a positive impact on animal welfare.

The policy has the potential to benefit those businesses which do not currently have CCTV installed by providing them with evidence to improve operating processes and inform efficiency reviews. The recordings may also be a useful tool for training new and existing staff members.

CCTV in areas where live animals are present will improve the efficiency of



monitoring and enforcement activity, by providing Official Veterinarians with information they need more readily and more conveniently. FSA enforcement data for 2020/21 indicates that at least 10% of slaughterhouse non-compliances are identified either by live or retrospective CCTV viewing and CCTV is routinely used as evidence to support enforcement action. Whether there is an overall increase in enforcement notices and in prosecutions will depend upon how this balances out relative to improved slaughterhouse compliance resulting from the preventive and deterrent effect of CCTV.

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.

**[1] (#\_ftnref1) CCTV internal impact assessment final.pdf (defra.gov.uk)**

([https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses/supporting\\_documents/CCTV%20internal%20impact%20assessment%20%20final.pdf](https://consult.defra.gov.uk/farm-animal-welfare/cctv-in-slaughterhouses/supporting_documents/CCTV%20internal%20impact%20assessment%20%20final.pdf))

**[2] (#\_ftnref2) How Much do Commercial CCTV Systems Cost? - BusinessWatch (businesswatchgroup.co.uk)**

(<https://www.businesswatchgroup.co.uk/how-much-do-commercial-cctv-systems-cost/#:~:text=Commercial%20CCTV%20systems%20can%20range%20on%20average%20from,when%20thinking%20of%20installing%20a%20commercial%20CCTV%20system.>)

**[3] (#\_ftnref3) Earnings and hours worked, region by occupation by four-digit SOC: ASHE Table 15 - Office for National Statistics (ons.gov.uk)**

(<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/regionbyoccupation4digitsoc2010ashtable15>)

# Competition Assessment

A Competition Assessment has been undertaken to assess the potential impact of mandatory CCTV coverage and recording of all areas of slaughterhouses in which live animals are present. This policy is not expected to have a significant detrimental effect on competition within the industry. The policy does not discriminate between premises, applying equally to all. The results of a filter test (consisting of nine yes/no questions) which support this conclusion are below, followed by evidence to support the answers.

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## The competition filter test

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Question	Answer  yes or no
<b>Q1:</b> In the market(s) affected by the new regulation, does any firm have more than 10% market share?	YES
<b>Q2:</b> In the market(s) affected by the new regulation, does any firm have more than 20% market share?	YES
<b>Q3:</b> In the market(s) affected by the new regulation, do the largest three firms together have at least 50% market share?	YES
<b>Q4:</b> Would the costs of the regulation affect some firms substantially more than others?	NO
<b>Q5:</b> Is the regulation likely to affect the market structure, changing the number or size of firms?	NO
<b>Q6:</b> Would the regulation lead to higher set-up costs for new or potential suppliers that existing suppliers do not have to meet?	NO

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## The competition filter test

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Question	Answer
	yes or no
Q7: Would the regulation lead to higher ongoing costs for new or potential suppliers that existing suppliers do not have to meet?	NO
Q8: Is the sector characterised by rapid technological change?	NO
Q9: Would the regulation restrict the ability of suppliers to choose the price, quality, range or location of their products?	NO

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## Post implementation review

We will monitor the implementation, compliance and enforcement of mandatory CCTV requirements at slaughterhouses for 12 months following the date of the regulations coming into force. We will conduct an official review on the impact of the regulations after five years.

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