

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*¹ (October 2016)

CONTENTS

A. Overview

B. Summary of key considerations relating to the Task and Finish Report

- 1. Membership of the Task and Finish Group**
- 2. Sourcing, analysis, interpretation and utilisation of information**
- 3. Responsibilities**

C. Summary and recommendations

D. References

E. Appendix

A. Overview

The RSPCA has campaigned for many years for the introduction of mandatory CCTV in abattoirs in Wales and were encouraged to see in 2013 the Welsh Government commission the Farm Animal Welfare Committee (FAWC) to provide independent and impartial advice about the methods and effectiveness of CCTV used in slaughterhouses. The FAWC report strongly recommended CCTV should be installed by all Food Business Operators in all areas where live animals are kept and where animals are stunned and killed. FAWC's view is that CCTV is an important safeguard and forms part of an holistic approach to high standards of animal health and welfare.

RSPCA Cymru was pleased to see the then Minister's statement of the October 2015² which accepted FAWC's recommendations and provided clarity, "*My firm belief is that every slaughterhouse in Wales should have CCTV installed in line with the FAWC recommendations. I am determined to make this happen*". The statement also made it a clear an industry body should link in with the Welsh Government's Animal Health and Welfare Framework Group and investigate the "*key questions such as how the footage should be monitored and stored*" but, crucially, was not charged with re-examining the case for CCTV.

¹<http://gov.wales/docs/drah/publications/161222-cctv-in-wales-slaughter-houses-en.pdf>

²<http://gov.wales/about/cabinet/cabinetstatements/previous-administration/2015/animalwelfareslaughter/?lang=en>

On publication of the industry's report 'Safeguarding Animal Welfare at Slaughter Task and Finish Group: The need for and possible implementation of a workable system of CCTV in all slaughterhouses in Wales', the RSPCA was very concerned to read an unbalanced account designed, it would appear, to reject the Welsh Government policy to implement FAWC's recommendations. We note that other stakeholders, such as the British Veterinary Association³ - with whom we work closely on welfare at slaughter - expressed their strong disappointment with the report's findings. For our response the RSPCA has produced this report in order to provide the evidence base for CCTV in abattoirs as well as catalogue our concerns regarding the methodology and omissions contained within the industry's report.

In particular, we are concerned by the following:

- Lack of transparency about the review - the process, nature of the investigation (e.g. did the industry's Task & Finish Group (TFG) actually visit any abattoirs that use/don't use CCTV?) and who was on the Group
- Failure to include on the TFG - or even to consult with - key stakeholder groups other than industry. At the very least, this leaves the process open to valid criticism that it was narrow and subjective and did not include all the relevant expertise
- The lack of depth and breadth of the information review leading to poorly evidenced conclusions
- The misinterpretation and selective use of other bodies' conclusions to support the view taken e.g. some points in the Farm Animal Welfare Committee (FAWC) Opinion (1) were cited out of context, while others - which would undermine the conclusions drawn in the TFG report - are omitted
- Use of irrelevant information to support conclusions e.g. the report mentions that RSPCA standards (and hence the RSPCA Assured Scheme [formerly Freedom Food]) require CCTV, perhaps suggesting that there is no need to require mandatory CCTV if approved abattoirs will already have it - but in fact only one abattoir out of more than 20 in Wales is Freedom Food approved
- Unsubstantiated and incorrect assumptions being made e.g. that those calling for CCTV want it to *replace* existing enforcement tools/approaches when in fact the call is for CCTV to be installed to *complement* those existing tools
- Use of individual exceptional cases to support the assertion that it is too difficult/costly to require CCTV
- Failure to give appropriate consideration to societal concerns about both welfare and lack of transparency in abattoirs

In view of the many significant shortcomings listed above, the validity of the views expressed in the Task and Finish Group report are very much open to question and the conclusions and recommendations should be considered with caution. We would instead encourage the use of evidence-based expert knowledge, experience and opinion from an appropriately wide range of relevant groups and individuals as the basis for decisions around the mandatory use of CCTV in abattoirs in Wales.

This document sets out RSPCA Cymru's views, informed by science, expert opinion and direct practical experience, on the key aspects of the TFG Report. It also provides evidence-based information which illustrates the feasibility and benefits of - and hence the case for - mandatory CCTV in abattoirs in Wales.

³<https://www.bva.co.uk/news-campaigns-and-policy/newsroom/news-releases/vets-disappointed-with-recommendations-for-wels-h-slaughterhouse-cctv/>

B. Summary of key considerations relating to the Task and Finish Report

1. Membership of the Task and Finish Group

A range of stakeholders have knowledge, experience and understanding of various aspects of animal welfare in abattoirs in Wales. These include:

- veterinary surgeons
- research scientists specialising in slaughter
- farm assurance schemes and associated organisations (including evidence-based animal welfare NGOs) that develop and support implementation of technical standards for - and audit - abattoir members of their scheme
- manufacturers of equipment used in abattoirs
- technology specialists with particular expertise in CCTV equipment and associated software
- business consultants with knowledge of the slaughter industry and/or CCTV installations costs
- abattoir industry representatives - including slaughterhouse owners, managers and staff

However, the TFG appeared only to seek the views of “*representatives of the abattoir industry in Wales*”. Whilst the knowledge and experience of such individuals is of course very valuable and it was essential that their input was used, they could only provide one perspective and could obviously not be viewed as objective, independent stakeholders. Failure to include on the Group - or even, apparently, to consult with - other key stakeholders undermines the credibility of the resulting report and casts doubt on its relevance, robustness, completeness and objectivity. This in turn must raise questions about the quality of its conclusions and recommendations.

2. Sourcing, analysis, interpretation and utilisation of information

It is stated in the Summary to the TFG report that the Group:

- studied the number and type of welfare incidents recorded in abattoirs in Wales in 2015 (alongside throughput) gleaned from the FSA
- considered the FAWC Opinion on the use of CCTV in abattoirs (1)

However, we have a number of concerns relating to the way in which information sources have been selected, analysed, interpreted and used, with failures and omissions in this respect inevitably resulting in poorly evidenced conclusions and recommendations. Some key points of concern, with associated examples, include the following:

i) Selective approach to use of information from cited sources, including failure to include or give appropriate weight to information relating to the benefits of CCTV:

- The TFG Report includes a number of points from the FAWC Opinion (1) relating to the *limitations* of CCTV use in abattoirs. In contrast, only a few of the many points FAWC (1) presents about the *benefits* of CCTV have been covered, with many important benefits outlined by FAWC (1) omitted, including the following:

- Point 50 - stating FAWC's view that whilst shortcomings need to be acknowledged, CCTV can have an authenticity and transparency which can be accepted as evidence
- Point 52 - discussing the significant usefulness of stored CCTV footage during investigations and enforcement
- Point 55 - stating that CCTV can provide a valuable training tool for operatives, AWOs and OVs in both identification of areas of failing welfare and as a contribution to welfare auditing and verification
- Point 56 - saying that strategic placement of live CCTV monitors may serve to encourage maintenance of good working practices
- Point 57 - outlining how recorded evidence of incidents can be used to verify reports of poor, non-standard or illegal practice and hence be used to improve operator behaviour and for disciplinary action or prosecution
- Point 58 - discussing how CCTV may allow retrospective assessment of the functioning of lairage, handling and slaughter areas, enabling assessment of how the behavioural needs of animal can be better satisfied.
- Point 59 - outlining how CCTV can provide FBOs and others with evidence on the operation and effectiveness of new equipment and practices
- Point 60 - stating how CCTV may be used for ante mortem inspection of livestock in lairage, providing evidence for analysis and change where necessary; FAWC observes that this would be especially useful for 'prey' species such as sheep which may mask painful conditions such as lameness when the stockman/OV is present but would behave normally under remote observation.
- Point 61 - outlining how CCTV combined with electrical stun monitoring can provide information for assessment and evaluation of effective stunning procedures

As these many important benefits, outlined in the FAWC Opinion (1), are not referred to in the TFG, it is reasonable to conclude that they were not therefore considered by the Group. This apparent selectivity over exactly what available information is or is not included in the TFG's review casts doubt on the validity and objectivity of the review and conclusions.

ii) Lack of depth and breadth of the information gathering and review:

- In point 7 of the TFG's report, the cost of installing CCTV is reported as being 'substantial' in large abattoirs, but the figure quoted (i.e. £18,000) is openly reported to be that relating to one single (unnamed) abattoir. It is not apparent that any further specific factual information on this issue was sought or considered. This sample size of one contrasts significantly with the information provided to FAWC by the RSPCA - and also quoted in the FAWC report (1) (but not the TFG's report) - regarding average costs of CCTV installation in the 40 abattoirs in the RSPCA Assured (formerly Freedom Food) scheme (i.e. between £3,000 - £10,000). The RSPCA standards for farm animals (2) applied under the scheme have required installation and monitoring of CCTV systems in all member abattoirs since 2011 (see the Appendix for details) and all have been able to comply. The abattoirs range in size and species coverage but have not found installation or on-going costs prohibitive. Factual, practical information of this kind is conspicuous by its absence in the TFG report
- Failure to consult with those (outwith the abattoir industry itself) who have direct practical experience of the use and impact of CCTV in commercial abattoirs (see also point B1.

above) has led to omission from the TFG's review of important evidence illustrating the wide-ranging benefits to both animals and abattoirs of installing properly placed, appropriately monitored CCTV systems. For example, evidence of how CCTV can facilitate objective investigation of allegations/concerns about malpractice could have been provided by the RSPCA's assurance scheme, RSPCA Assured (formerly Freedom Food). An example of use of CCTV footage for this purpose was provided by an incident in which the RSPCA received a complaint about alleged malpractice at a Freedom Food approved pig abattoir. Pigs had reportedly been heard to be squealing to an unusual degree during unloading into the lairage, leading to concerns that they were being mistreated. The complainants provided information about the exact time of the alleged incident, allowing an RSPCA Farm Livestock Officer to ask to view CCTV of the unloading area at the precise time in question. The footage showed that staff had behaved appropriately and in line with RSPCA standards, and that the vocalising had not been caused by any malpractice. This case study illustrates not only the usefulness of CCTV footage in helping those who monitor compliance with welfare standards, but also its value to abattoirs themselves in helping to establish facts when allegations of poor practice are made.

iii) Failure to include relevant information from other sources:

- In May 2016 (five months before publication of the TFG's report), the Food Standards Agency (FSA) published the results of its 2016 survey of CCTV in abattoirs (3). This included detailed information about the percentage of livestock (by species) slaughtered in abattoirs in England and Wales that have "*some form of CCTV in use*". At face value, the figures were reassuringly high i.e.
 - 92% of cattle
 - 96% of pigs
 - 88% of sheep and
 - 99% of poultry
- However, the FSA reported that these values had fallen for cattle and sheep compared with 2015. The report also provided details of exactly where in the slaughterhouses the CCTV was placed, and this revealed that in many cases, only a minority of the slaughterhouses that were categorised as having "*some form of CCTV in use*" had placed cameras in areas of the premises where welfare issues were most likely to occur. For example:
 - Only 37% of slaughterhouses with CCTV had a camera placed in the stun area or in the race and restraint area
 - Under half (46%) of those slaughterhouses had CCTV in the unloading (46%) or lairage (43%) areas
 - Only 38% had CCTV in the bleed area

These figures illustrate that simply having "*some form of CCTV in use*" does not ensure that cameras are appropriately distributed in key areas throughout the slaughterhouse and hence important animal welfare problems - potentially including breaches of legislation - may not be captured by the system on those premises

- The TFG do not mention the FSA's 2016 survey results or any of the important information in their report, leading to an acceptance at face value of the FSA's conclusion in their 2011 report (4) that CCTV has no impact on compliance with legislation (see point iv) below).

iv) Failures in analysis of information:

- The FAWC Opinion (1) is widely quoted by the TFG and the cited shortcomings of CCTV taken from the report have been accepted without critical review or addition of further primary source information
- In addition, in Section 5, the TFG Report cites and supports the FSA's conclusion in their 2011 report (4) - and FAWC's subsequent reporting of it - that the presence of CCTV in a slaughterhouse does not improve compliance with relevant welfare legislation. However, this view fails to take account of the fact that no details were presented in the FSA report to clarify how a slaughterhouse would 'qualify' as having CCTV. As outlined in point iii) above, a subsequent survey by the FSA in 2016 (not reported by the TFG) provided details of CCTV placement and showed that in many cases, critical areas were not covered, making it inappropriate to draw any conclusions about the impact that a sufficient number of appropriately situated CCTV would have on compliance with welfare law.

v) Use of irrelevant information to support conclusions:

- The TFG states that the RSPCA welfare standards for farm animals, and hence the RSPCA Assured scheme, require CCTV in approved abattoirs, perhaps implying that mandatory CCTV is not required because assurance schemes are covering this issue already. However, the relevance of this information is questionable given that only one abattoir (out of a total of more than 20 abattoirs) in Wales is Freedom Food approved
- The TFG reports that many abattoirs are members of the Red Tractor scheme which sets "*additional welfare requirements*". However the scheme standards do not require use of CCTV so the relevance of this information is not clear.

vi) Unsubstantiated assertions/assumptions:

- Several statements made within the report (including in Section 2) appear to rely on assumption and perception, rather than fact, with little or no evidence being provided to support the assertion being made. These include the following points:
 - It is implied several times in the TFG report that those calling for CCTV want it to *replace* existing enforcement tools/approaches - and (on the same lines) that CCTV would have to be *instead of* these other tools. We are not aware that any of the significant bodies who are calling for mandatory CCTV have indicated that it should *replace* other forms of monitoring or enforcement. Rather, the RSPCA believes that CCTV will *complement* existing processes and tools, extending both the scope of monitoring and enforcement (e.g. CCTV can be used in areas where it is difficult from personnel to view processes directly - a point made in the FAWC Report (1) - point 53) as well as adding significant rigour and verification
 - The view is expressed that the presence of CCTV will not make a difference to the behaviour of abattoir staff. Neither research relating to the human psychology/behaviour change theory nor evidence specifically relating to human behaviour in abattoirs with/without CCTV has been presented or apparently gathered or reviewed. This assertion also contradicts the view stated in the FAWC Opinion (1) (Point 56) - but apparently not considered by the TFG - that: "*The strategic placing of live CCTV monitors in areas frequented by slaughterhouse personnel may serve to encourage collective responsibility for the respect and maintenance of good practices.*"

3. Responsibilities

The TFG appears not to have given proper consideration to the overall responsibilities placed on industry and governments in relation to oversight and enforcement in abattoirs. In that regard, the following points are relevant:

- The report fails to consider public concerns about welfare and lack of transparency in abattoirs - thereby failing to align with one of the Wales Animal Health and Welfare Framework Group's 'strategic outcomes' i.e. *"that people have trust and have confidence in the way food is produced"*
- In the final bullet point of the Conclusions, the TFG report states that the working group itself concluded that CCTV is a useful additional tool in abattoirs for helping to raise animal welfare, yet then fails to recommend that it should be used on all abattoirs. This seems to contradict directly the stated intention under point 10 of the Report to: *"reinforce messages on animal health and welfare"*
- It is concerning to see that one of the Wales Animal Health and Welfare Framework Group's 'strategic outcomes' are that Wales has *"healthy and productive animals"* with no mention of *welfare* overall. It is now widely accepted that health is only one element of welfare and for some years now, there has been a generally accepted recognition of the need to take proper account of non-health welfare when considering how to ensure that the wellbeing of animals is safeguarded to a level - and in ways - acceptable to society. The large proportion (76 percent) of UK respondents to the 2016 Eurobarometer survey (5) who expressed the view that farm animals should probably (37 percent) or definitely (39 percent) be better protected than they are now should provide a strong and compelling steer to those (including the Welsh Government) who are both accountable to the public and in a position to make and implement decisions relating to protection of livestock welfare
- Ensuring that abattoirs are in a position to - and do - comply with relevant legislation is clearly an essential part of the role of government and associated enforcement agencies. It is a requirement of the Welfare of Animals at the Time of Killing (WATOK) Wales Regulations 2014 to monitor activities not visible to personnel/enforcers. The following WATOK provisions are relevant to this:
 - *Schedule 1, part 5:*
 - Exposure to gas - pigs*
29. - (2) *The business operator and any person engaged in the stunning of pigs by exposure to gas must ensure that - d) there is a means of visually monitoring pigs which are in the gas stunner;...*
 - Exposure to gas - poultry*
30 - (3) *The business operator and any person engaged in the stunning of poultry by exposure to gas must ensure that - b) there is a means of visually monitoring poultry which are in the gas stunner;..*

CCTV provides a viable option for ensuring compliance with these requirements which can be difficult to achieve through human observation. Real time and retrospective review of the CCTV footage obtained also allows proper evaluation of the effectiveness of the gas through observation of animal behaviour and can alert to any potential and actual malfunctions or other problems that could lead to animal welfare problems. Whilst the TFG Report does make reference to the FSA Report's (3) view that CCTV may provide a 'useful monitoring tool' where Animal Welfare Officers may not have a clear view of certain processes, this point is not developed further in the TFG report and the unique properties of CCTV in enabling legally required observation in crucial but inaccessible areas are not appropriately acknowledged.

C. Summary and recommendations

- 1) As set out above, RSPCA Cymru has serious concerns about many aspects relating to the Safeguarding Animal Welfare at Slaughter Task and Finish Group and its report. We believe that the nature and number of clear and significant shortcomings associated with the Group's work should cast serious doubt on the validity of their report's conclusions and recommendations. It would not, therefore, be advisable for the report to be used as a basis for a decision now on whether mandatory CCTV in abattoirs should be introduced into legislation in Wales.
- 2) We would urge that before coming to any conclusions, the Welsh Government should commission a properly transparent, wide-ranging, objective review of the issue of use of CCTV in abattoirs, benefitting from the involvement of the full range of relevant stakeholders (see Section B1. above), either as members of the review Group itself or via consultation.
- 3) In addition, we would ask that at the very least, before any decision is made, the points provided below (which summarise information provided elsewhere in this document) on the **benefits** of installation and use of CCTV in abattoirs are fully considered:
 - CCTV enables monitoring – by auditors/vets/managers/Animal Welfare Officers - of practices and activities that take place outside the 'snapshot' inspection visit period or management observation period. Hence, it also enables verification of compliance with requirements/legislation in key areas. Assessment by external auditors of compliance with welfare standards on an ongoing basis is challenging, with uncertainties about whether the conditions, practices and behaviour seen during inspections and/or whilst the manager or AWO is present are typical and maintained at other times.
 - The ability to access CCTV footage showing activity at other times when inspectors/managers are not present is clearly hugely beneficial. A sufficient number of appropriately placed CCTV cameras enable continuous and simultaneous monitoring, including of many areas/activities posing high risk to animal welfare. Cameras can be installed to focus on the on-going activity in multiple welfare 'hot spots' simultaneously in a way that the Animal Welfare Officer or other abattoir managers cannot. Footage from a number of cameras can either be viewed 'live' by abattoirs managers and/or AWOs and/or be viewed retrospectively to allow monitoring of practices, and follow up action can then be taken as necessary to avoid repetition of any problems identified.
 - CCTV has proved to be an excellent tool for RSPCA and RSPCA Assured field staff who monitor/audit Freedom Food scheme abattoir members, enabling random 'spot checks' of previous activities over at least a three month period before the visit (RSPCA standards require storage of all footage for at least three months – please see the Appendix). Field staff can select random time periods to view, or can scroll through the 'barcode' (a facility available on the footage) to look at any activity they want to focus on.
 - CCTV facilitates objective investigation of allegations/concerns about malpractice. The ability to select footage from a specific time period which shows a specific area of the abattoir allows individual incidents and activities to be reviewed. In addition to supporting the work of enforcement agencies, this can be of value to abattoirs themselves in helping to establish facts when allegations of poor practice are made.
 - The footage can serve as a valuable training tool, and abattoir staff and their managers can (and do) use the footage as a training aid. It can be viewed individually or collectively and any issues discussed to enable formulation of better methods of operation, handling etc. and to identify professional development needs. Footage showing examples of good practice can also be shared with staff to illustrate how something should be done.
 - CCTV is very beneficial (even essential for legal compliance) in systems where it is

difficult/not possible to monitor the animals at all times during the slaughter process. For example, this would effectively be the case in all the poultry gas killing systems that are currently in commercial use in the UK. Monitoring of the animals with any degree of clarity to assess their welfare in such systems is typically near impossible. Gas systems are often a 'black box' and generally the only indicator to determine the effectiveness of kill is whether the animals are dead on exit. RSPCA staff have visited a broiler slaughter plant where the LINCO gas killing system was in use and where a mobile camera has been installed within it so birds can be continuously monitored throughout the killing process. At this plant, the staff considered having the camera as an essential and valuable monitoring tool, as they could adjust the concentration of the gas immediately depending on the reactions of the birds. Further, a legal requirement relating to gas killing systems for poultry under the WATOK is that there must be a means of visually monitoring birds in the chamber. Although this requirement may be considered fulfilled where several windows are positioned along the sides of the gas chambers, having seen such systems, it is not possible to observe the birds clearly: the windows are small, poorly positioned (too low to see clearly into the transport crates and spaced too far apart) and tinted (it is necessary to use a torch to help observe the birds). Further, the windows quickly become dirty, making clear observation impossible. Installing CCTV within the system aids observation of birds and enables businesses to become compliant with the WATOK requirements. The same principles apply to the gas killing of pigs, where cameras could be used to ensure clear monitoring of the animals within the chamber.

- More sophisticated CCTV systems can allow pinpointing of specific periods of activity. This reduces the need to view what potentially could be hours of low activity (e.g. in a lairage overnight).
- CCTV has proved to be very useful in farmed salmon slaughter plants and is used as a means of communication between the well boats bringing the fish from the sea cages and staff in the plant. The boat has cameras in the well and monitors the crowding density of fish going into the pipes. The captain can also view the slaughter section and can alter the speed at which the fish are pumped up to the slaughter station. The manager of the plant also has a TV monitor to view live footage and can intervene if something unacceptable is seen, or if something breaks down etc.
- Public surveys (5) indicate that citizens care greatly about the welfare of farm animals and believe that they should be better protected. Governments have a responsibility to respond to the concern of society and to take actions aimed at addressing areas of concern. Introduction of legislation requiring mandatory CCTV in Wales would help to deliver the one of the Wales Animal Health and Welfare Framework Group's 'strategic outcomes' i.e. "that people have trust and have confidence in the way food is produced".

The tangible benefits of installation and use of properly placed, effectively monitored, commercially viable CCTV in abattoirs for slaughterhouse staff and management, enforcement bodies and the many millions of animals slaughtered every year are not in dispute. It is therefore very difficult to understand why these systems are not mandatory or why they cannot become so in the near future to the benefit of all.

The RSPCA is very keen to see a plan from the Welsh Government for CCTV in all abattoirs in Wales - a position for which it has previously expressed support and commitment to implement. It is hoped this report has assisted in highlighting the shortcomings of the industry report, as well as presenting some of the evidence base to move forward with this important development for animal welfare.

D. References:

- (1) Farm Animal Welfare Committee (FAWC) Opinion on CCTV in slaughterhouse. February 2015
 - (2) RSPCA welfare standards for farm animals www.rspca.org.uk/welfarestandards
 - (3) Food Standards Agency Results of CCTV survey in England and Wales Slaughterhouses, May 2016
 - (4) Food Standards Agency Animal Welfare Survey in Great Britain, September September 2011.
 - (5) Special Eurobarometer 442 Report: Attitudes of Europeans towards Animal Welfare. March 2016
file:///home/chronos/u-10d2ba23b889d095ffcfd323dca4fb9dfe84cc1/Downloads/ebs_442_en.pdf
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E. Appendix

RSPCA WELFARE STANDARDS FOR FARM ANIMALS, which must be applied by all members of the Society's Freedom Food farm assurance scheme, have since 2011 included detailed mandatory requirements on use of CCTV cameras in abattoirs. Cameras must be placed such that they cover all key areas, from the time of unloading animals off transporters to the time of death. All footage must be stored for at least three months and be available to be viewed at any time by Freedom Food field staff (including the Assessors who audit Freedom Food members) and by RSPCA Farm Animals Department staff (including the Farm Livestock Officers who monitor scheme members).

The relevant standards are outlined below:

SLAUGHTER/KILLING SECTION

CCTV

The use of Closed Circuit Television (CCTV) in areas where live animals are present can assist those responsible for monitoring and enforcing animal welfare within the abattoir in ensuring that standards are maintained. It is strongly recommended that CCTV footage is also used for in-house training programmes and to provide an additional level of security at the abattoir.

STANDARD (TV) X.1

A functional CCTV system must be installed and operational to monitor animals undergoing the following processes at the abattoir (as applicable):

For pigs, beef cattle, dairy cattle, sheep:

- a) unloading from vehicles into the lairage
- b) lairaging, including the movement of animals out of the lairage towards the stun point
- c) stunning, including animals approaching the stun area
- d) shackling, including the shackling of animals following gas killing
- e) sticking
- f) entering a Controlled Atmosphere System (CAS).

For poultry:

- a) unloading from vehicles into the lairage
- b) shackling, including the shackling of birds following gas killing
- c) stunning, including exiting the electrical waterbath
- d) neck cutting
- e) entering a Controlled Atmosphere System (CAS).

STANDARD (TV) X.2

CCTV cameras must be positioned to ensure a clear view of the processes being monitored is achieved at all times.

STANDARD (TV) X.3

It must be possible to observe clearly the view from each camera at all times via one or more monitors.

STANDARD (TV) X.4

CCTV footage must be recorded at all times where animals are undergoing any of the processes listed under standard S(TV) X.1.

STANDARD (TV) X.5

The recorded CCTV footage must be:

- a) retained by the abattoir for a period of at least three months, and
- b) available for viewing on site by Freedom Food field staff and RSPCA Farm Animals Department staff on request.

Where possible it may be useful for managers to retain CCTV footage for longer than the three months specified in S(TV) X.5, for their own monitoring and security purposes.

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