
ANIMAL WELFARE

Report by Jason Feeney, Chief Operating Officer

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1 SUMMARY

1.1 This paper sets out our current and proposed activities in England and Wales as part of our ongoing programme to “**Deter, Prevent, Detect and Enforce**” animal welfare breaches.

The Board is asked to:

- **Confirm** they are content with our reactive response to reported instances of animal welfare incidents;
- **Note** the current status and proposed next steps on our systemic approach to deliver the “**Deter, Prevent, Detect, Enforce**” welfare agenda;
- **Consider and discuss** potential next steps for future work on animal welfare; and
- **Reiterate** the commitment of the Food Standards Agency (FSA) to promoting a zero tolerance approach to animal welfare breaches.

2 INTRODUCTION

2.1 At the May 2016 Board meeting members commissioned a paper assessing what further changes would be needed to achieve the FSA objectives of verifying that business operators comply with their animal welfare obligations and, where they fail to do so, that breaches are quickly and effectively identified and addressed.

2.2 This paper outlines both the reactive and systemic programme of activities in place to achieve both objectives, sets out the latest position on the use of CCTV in slaughterhouses as a tool to support the welfare assessment of farmed animals, and raises a number of potential further next steps for Board discussion.

2.3 This programme of work is aligned to Regulating Our Future (RoF) principles ensuring that business operators take primary responsibility for all aspects of food they produce, that information is provided to consumers enabling them to make informed choices and that regulatory activity is risk based, targeted and proportionate.

3 BACKGROUND AND CONTEXT

- 3.1 Under EU regulations, full responsibility for animal welfare and food safety in slaughterhouses rests with business operators who must meet legislative requirements in terms of slaughterhouse design, layout, equipment and operation. Their slaughterers must be competent, appropriately trained and be licensed to slaughter all species presented to them. The business operator is responsible for ensuring all animal needs are met and for the welfare of animals in their care. Responsible business operators and their representative organisations have made it clear that welfare breaches are unacceptable, should be effectively addressed and damage the reputation of the industry as a whole.
- 3.2 The Department for Environment, Food and Rural Affairs (Defra) and the Welsh Government have lead policy responsibility for animal welfare issues including those relating to businesses regulated by the FSA. In Northern Ireland the Department for Agriculture, Environment and Rural Affairs (DAERA) have policy and delivery responsibility for animal welfare issues.
- 3.3 The role of the FSA in slaughterhouses is to maintain an effective system of controls that allows us to verify compliance and to take proportionate enforcement action where there is non-compliance. Official veterinarians (OVs) work in every slaughterhouse across England and Wales and make regular unannounced ante-mortem checks to ensure that welfare of all animals and birds is being appropriately safeguarded.
- 3.4 The FSA also has a wider role to protect the consumer's wider interests in relation to food, to ensure that businesses produce food we can trust and that businesses are transparent in how food is produced. We have a role identified in our founding legislation to ensure that consumers have access to information to enable them to make informed choices about the food they eat.
- 3.5 The FSA has a zero tolerance approach to animal welfare breaches and FSA staff take a prompt, proportionate and risk based approach to enforcement action if breaches of animal welfare legislation in slaughterhouses are identified. As detailed later in this paper we continue to build our capability in this important area.
- 3.6 The response of the FSA to animal welfare issues is underpinned by two key drivers:
- Discharging its regulatory and delivery responsibilities in maintaining the system of verification on behalf of Defra and Welsh Government (animal welfare checks in Northern Ireland are carried out by the DAERA); and
 - Its responsibility to act in the interests of the consumer given their material interest in animal welfare in the food industry.
- 3.7 The FSA primarily discharges these responsibilities through:

- Prompt and effective reaction to reported animal welfare incidents;
- Wide ranging systemic programme of activity to deliver its “**Deter, Prevent, Detect, Enforce**” programme; and
- Regular publication of animal welfare related data.

3.8 When breaches do occur the FSA uses a proportionate, risk based approach to enforcement actions. This means that we apply the enforcement hierarchy in a way that allows us to take informal enforcement action where breaches are minor and where we believe that this will be effective in avoiding future non-compliance, and take formal action, such as serving of notices in cases where non-compliance falls into the most severe categories which may have caused pain or suffering or where informal enforcement has not resulted in subsequent compliance by the business operator.

4 CONSUMER INTEREST

4.1 The latest Public Attitudes Tracker from May 2016 shows animal welfare as equal third food issue of concern alongside salt and behind sugar and food waste. This represents the highest level of response for animal welfare in the Public Attitudes Tracker since the survey began in 2010.

4.2 Most recently findings from an on-line survey conducted by Mintel in July 2016 on the Ethical Consumer found that:

“The free-range label garners the highest overall awareness amongst Brits with 71% of consumers buying products bearing the free-range label. The label’s success in part reflects the high importance Brits place on animal welfare.”

5. CURRENT ACTIVITY

Reactive Response

5.1 The FSA response to the reporting of any serious breaches in animal welfare standards in slaughterhouses is driven by a set of clear protocols and procedures. All welfare incidents, where there is non-compliance with legislation, must be recorded on the Animal Welfare database and any verbal advice given to a business operator must be followed up in writing.

5.2 The most serious welfare breaches are submitted for formal investigation and coordinated through the FSA Incident Management Unit involving:

- Immediate mobilisation of investigation teams to investigate potential breaches including reviewing the business approval to operate and Certificates of Competence for individual slaughterhouse staff;

- Prompt, regular and transparent reporting of incidents and status reporting on progress of investigations to ensure open and accurate responses to media and consumer interest;
- Timely completion of investigations and prompt and proportionate actions on investigation recommendations up to and including prosecution; and
- Post incident review and identified improvements are implemented.

Deter, Prevent, Detect, Enforce Programme

5.3 The animal welfare assurance programme is based on the principles of “**Deter, Prevent, Detect, Enforce**” in line with good practice in wider law enforcement. This Welfare Assurance Programme, sponsored in partnership with Defra, clearly sets out our ambition and approach enabling us to track FSA and industry performance.

5.4 Delivery of this programme of activities can be summarised under four key themes:

a) Strengthening **verification of compliance**

- Setting minimum targets for the quantity of animal welfare checks to be undertaken and targets for the verification of those checks by FSA staff.
- Introducing new animal welfare verification forms for in-plant use to achieve a robust audit trail of verification activity and clear evidence of the checks taking place.
- Prioritising animal welfare in the audit programme, including premises not reporting animal welfare incidents.
- Targeting unannounced inspections in premises with actual or potential welfare concerns.
- Increasing verification levels for non-compliant business operators at their own expense by increasing staffing levels for additional checks/verification until compliance is achieved.

b) Clarifying **accountability and improving collaboration**

- Introducing an in-plant animal welfare protocol which all FSA staff are required to sign declaring that they are aware of the animal welfare verification requirements.
- Clarifying enforcement responsibilities between FSA directly employed staff (the Competent Authority on enforcement) and third party suppliers. The new Field Operations structure provides a clearer split of responsibilities on animal welfare enforcement between the FSA and contractor staff and one

of the primary objectives of the new operations and veterinary management roles is to drive more consistent application of controls, particularly in relation to enforcement action. This requirement has also been reflected in the new contract specification and performance management regime for third party suppliers, which is currently being re-tendered with new contracts to be let from April 2017.

- Delivering improved assurance through the rotation of OVs as part of the new contract arrangements and the risk based deployment of the central veterinary audit team. The OV plays a critical role in animal welfare, challenging and supporting FBOs as appropriate to comply with requirements and leading the MHI team in their work on welfare. It is therefore considered that regular rotation of OVs will ensure that on site teams do not become habituated to local poor practice. Consideration has been given to the rotation of MHIs but the costs of this would be very material and would be borne by the taxpayer and compliant businesses, who would strongly object to the additional costs, which could not be justified in terms of value for money given that the benefits can be achieved through the additional controls already introduced and the rotation of OVs. In addition to financial costs there would be potentially material issues of staff relations and morale and engagement.
- FSA Chief Executive and Chief Operating Office have introduced monthly reviews of all plants where there are ongoing issues of non-compliance to ensure that there is rigour and consistency in enforcement.

c) Improving **education and instruction**

- Designing and implementing an animal welfare communications campaign for premises – including posters and species specific welfare indicator cards which reflect the new instructions to assist inspection teams in recognising effective signs of stunning and promote our animal welfare verification activity.
- Reviewing and updating all FSA instructions and guidance to reflect animal welfare principles, particularly on enforcement, including improved guidance on minimum frequency of compliance checks.
- The FSA's Welfare Portfolio Group comprises staff from all disciplines with a veterinary lead. The Group acts as the voice of welfare locally, improving awareness and reporting of welfare cases. The Group reviews and approves changes to welfare guidance and instructions and produces technical articles to help field staff better understand the requirements of welfare legislation and best practice.
- The FSA's Science, Evidence & Research Division has built up considerable intelligence on behavioural economics in the meat industry, working in collaboration with IPSOS MORI and University College London. Using this information the FSA's Social Science team has put together an

educational programme of workshops and seminars focused on slaughterhouse economics and business operator behaviour which will be disseminated to operations managers in the autumn.

d) **Better analysis and reporting**

- We are in the process of introducing a new system – Chronos – which integrates recording and analysis of all FSA compliance, audit and enforcement activity in a single system for the first time.
- This single system approach will lead to significantly improved, cross-referenced reporting. The initial business reports will focus on numbers and types of welfare breaches recorded in stun and non-stun slaughterhouses, enforcement activity carried out and throughput figures, by species, for premises with full and partial CCTV.
- Using the outcomes from sources including themed audits, new welfare reporting system, CCTV survey results and local intelligence we are better placed to deliver targeted, risk based official controls.
- The Chief Operating Officer has set up an Animal Welfare Steering Group to lead the successful delivery of this programme of activity with membership drawn from across the stakeholder community.

CCTV - Use in Animal Welfare

- 5.5 In June 2015 the FSA reported to the Board on its unannounced inspection programme on animal welfare and the level of assurance this provides. This paper can be found at the following link:
food.gov.uk/sites/default/files/fsa150605.pdf
- 5.6 This paper also discussed the Farm Animal Welfare Committee's (FAWC) opinion on the use of CCTV in slaughterhouses to assess the welfare of farmed animals and industry steps to improve consistency and effectiveness of CCTV which included making footage available to FSA.
- 5.7 In November 2015 industry published its own guidance on the installation of CCTV and use of CCTV footage for welfare purposes which can be found at the following link:
[bmpa.uk.com/ attachments/Resources/4933_S4.pdf](http://bmpa.uk.com/attachments/Resources/4933_S4.pdf)
- 5.8 In May 2016 the FSA carried out its fourth survey on CCTV in slaughterhouses and all 278 operating slaughterhouses voluntarily took part.
- 5.9 The FSA supports use of CCTV by business operators as part of their system for monitoring and protecting animal welfare. The use of CCTV does not replace direct oversight by management, or checks by officials, but it can improve their effectiveness. For effective coverage we would expect business operators to have CCTV cameras or other equivalent technology to monitor

performance of staff at the point of stunning and slaughter (as a minimum), for the footage to be routinely available to competent authorities and for footage being retained by the business operator for a reasonable period of time.

5.10 We have been encouraged by increase in use in recent years. However, the latest survey results appear to suggest that uptake may have plateaued.

5.11 High level results of the survey show:

- 102 out of 207 red meat slaughterhouses (49.3%) and 50 out of 71 white meat slaughterhouses (70.4%) in England and Wales have some form of CCTV in use for animal welfare purposes.
- By comparison, in the 2015 survey 105 out of 215 red meat slaughterhouses (48.8%) and 51 out of 72 white meat slaughterhouses (70.8%) in England and Wales had some form of CCTV for animal welfare purposes.
- We estimate that in England and Wales 92% of cattle, 96% of pigs, 88% of sheep and 99% of poultry throughput comes from premises with some form of CCTV in use. 56% of throughput comes from premises with the improved assurance that full CCTV provides

5.12 The Animal Welfare section of the Q1 Performance Report provides further information on the nature of CCTV in plants. The results of the survey were published on the FSA website on 31 August 2016 and can be found at the following link:

food.gov.uk/sites/default/files/cctv-survey-results-2016.pdf

6 STAKEHOLDER INTEREST & ENGAGEMENT

6.1 Animal welfare in the UK food industry is a high profile issue attracting consumer, media and political interest. There is considerable interest from a wide range of stakeholder communities with strongly held and sometimes conflicting views. In developing our approach we have:

- Worked closely in partnership with Defra and Welsh government colleagues in developing a robust and proportionate approach which delivers the agreed policy outcomes;
- Developed a collaborative approach with industry to ensure that whilst responsibility for an animal's welfare from entering a slaughterhouse to its point of killing rests with the business operator, we can work together to effectively and proportionately assure and enforce their discharge of that responsibility;
- Published more data and information on welfare including audit report findings to better inform consumers and the third sector;

- Exchanged approaches and lessons learned with colleagues in devolved administrations – Scotland and Northern Ireland.

7 GOING FORWARD – ISSUES FOR DISCUSSION

Transparency and openness

- 7.1 In line with the FSA's founding principle of openness, the Board has committed to the principle of making 95% or more of the data that the FSA holds into open data. In the last year we have been seeking to improve the depth and regularity of our reporting on welfare: new pages have been added to the quarterly performance report, and an improved recording system has been implemented which should enable further improvements to reporting and transparency in future. Historically there has been reluctance to publish details of individual plants with breaches of welfare because of concerns over staff welfare and security.

End to End Welfare

- 7.2 The FSA is one of several organisations which have the ability to influence the treatment of animals on their journey through production and at slaughter. Different organisations have various approaches to discharging their responsibilities and positive examples exist of joined up approaches, such as through the use of Food Chain Information (FCI) and Collection and Communication of Inspection Results (CCIR)
- 7.3 Wider and more regular publication of data on welfare issues by the FSA, showing where in the chain they occur, will potentially make a contribution to work by others to improve welfare along the chain.

CCTV in slaughterhouses

- 7.4 There is no legal requirement for business operators to install CCTV in slaughterhouses but the Farm Animal Welfare Committee (FAWC) opinion reports that its presence can have positive outcomes for the welfare of animals in the slaughterhouse. The FSA, Defra, and the industry all support the voluntary adoption of CCTV as a useful complement to the existing system of control. Many business operators have used this facility to good effect and all the major retailers specify the use of CCTV in their contracts. The FSA is well placed to continue to work with industry and Government partners to encourage further uptake.
- 7.5 Whilst the FSA is well placed to investigate ways in which the presence of CCTV might be further exploited to drive behaviour change towards improved animal welfare in slaughterhouses, some changes would require action from Defra as the policy lead. Question for consideration:
- Should the case be made, to Defra ministers and the devolved administrations in Wales and Northern Ireland, for mandatory CCTV or

equivalent technology installation in slaughterhouses? Given the current absence of legal obligation, this would require new domestic legislation.

8 CONCLUSION AND RECOMMENDATIONS

- 8.1 This paper details the business operators' responsibilities in relation to animal welfare and sets out the FSA's reactive and systemic programme of activities needed to achieve its objectives of verifying welfare and ensuring the business operators meets their legal and moral responsibilities to the animals under their care, ensuring they are quickly and effectively addressed.
- 8.2 The consumer and stakeholder positions are clarified and the FSA's activities, including the response to incidents, the "**Deter, Prevent, Detect, Enforce**" programme and results of the latest CCTV survey are set out in detail.
- 8.3 The Board is asked to:
- **Confirm** they are content with our reactive response to reported instances of animal welfare incidents;
 - **Note** the current status and proposed next steps on our systemic approach to deliver the "**Deter, Prevent, Detect, Enforce**" welfare agenda;
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