

Response ID ANON-AMRG-937Y-3

Submitted to **Consultation on introduction of compulsory closed circuit TV recording of slaughter at abattoirs in Scotland**

Submitted on **2018-04-09 11:14:02**

Enhanced Animal Welfare Provision

1 Should there be compulsory CCTV recording in all areas of approved slaughterhouses in Scotland where live animals are present?

Yes

Please give reasons for your response. :

This is a useful support for improving practice and a useful safeguard for ensuring animal welfare

2 Have we identified the main potential animal welfare gains from CCTV in slaughterhouses?

Yes

Please give any other potential animal welfare gains.:

Broadly: however, it is important for the spirit of the legislation that it is not introduced on the premise that staff are doing bad things in slaughterhouses and the cameras will catch them out. Staff in slaughterhouses come to work to do an important job well. While doubtless there is room for improvement, we need to start from the assumption that management and staff want to treat animals well and professionally.

The point you make about observation of animals when humans are not present is important. For example, animals which are in the lairage overnight may be distressed or subject to bullying by other animals and this may not be picked up without cameras.

CCTV should be seen as a positive aid to staff training and development: for example, some staff may have particular skills in moving animals without causing them stress and CCTV can help with sharing those skills both within that workplace and more widely.

The introduction of compulsory CCTV should be accompanied by additional support for staff training and quality improvement in the sector rather than be seen as another burden. In some older settings, improving animal welfare may require redesign or re-equipment of premises.

It is of course essential that standards are enforced and prosecutions pursued where breaches have occurred, and CCTV will be helpful in that regard as well as in deterring breaches.

Enhanced Animal Welfare Enforcement

3 Is it reasonable to require Food Business Operators to retain CCTV footage for 90 days?

Yes

Please give reasons for your response.:

4 Should there be unrestricted access to CCTV footage, both real time and stored, for reasons of ensuring animal welfare by officers authorised by the Scottish Ministers?

Don't know

Please give reasons for your response.:

If this data belongs to anyone, it belongs to the slaughterhouse operator, so I'm not sure that the Government should simply be able to help itself to the data. Similarly, the workers who appear on the footage should have confidence that their data is being used appropriately and for a defined purpose.

Cost of Compulsory CCTV to Businesses

5 What do you think the cost of introducing compulsory CCTV in slaughterhouses in Scotland would be to (a) individual slaughterhouses and (b) to the Scottish slaughter industry as a whole?

Please provide evidence to support your response.:

I don't have better figures than in the paper

6 Do you consider that the costs of introducing compulsory CCTV in Scottish slaughterhouses are reasonable and proportionate for individual businesses irrespective of size?

Yes

Please provide evidence to support your response.:

this is a case where exemption for smaller businesses is not justified

7 Are there any other economic benefits or costs not mentioned in the consultation document?

Yes

Please explain what these might be and provide evidence to support your response.:

Given the high dependence on non-UK EU vets, and given the relatively high costs of providing veterinary supervision in slaughterhouses, should we be looking at the feasibility of vets being in several places at once through the use of robotic avatar vets linked to a live vet?

These robot vets would provide additional support to good practice.

8 Should CCTV be installed in all approved slaughterhouses, regardless of size?

Yes

Please provide justification for your response.:

It is essential for public confidence in the system that there is universal coverage: the smaller slaughterhouses are also more likely to have part-time staff and less likely to have state of the art facilities so animal welfare at slaughter is likely to be more variable.

However, given the marginal viability of many smaller slaughterhouses and the value of these to the local food economy, Government should grant-aid installation costs (for example through FPMC) in smaller slaughterhouses which have a viable future.

9 Should the Scottish Government help smaller businesses to comply with a requirement for compulsory CCTV?

Yes

Please provide justification for your response.:

yes, see above

10 Are you content for the Scottish Government to contact you for further clarification of the financial effects that you have estimated?

Yes

About the consultation

11 Do you consider that that consultation explained the key issues sufficiently to properly consider your responses?

Yes

12 Do you consider that you had sufficient time to respond to the consultation?

Yes

13 Do you have any other comments on the way this consultation has been conducted?

Do you have any other comments on the way this consultation has been conducted?:

The consultation should confirm that the proposals are compatible with human rights legislation and the general data protection regulation: and should set out how the CCTV footage will be kept secure.

About you

What is your name?

Name:

pete ritchie

What is your email address?

Email:

pete@nourishscotland.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Nourish Scotland

Sector and Origin

Animal Welfare Organisation

Other, please specify::

food policy organisation

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: