



**LAW AND DISORDER:**

# **THE ENFORCEMENT SOLUTION**

animal**EQUALITY**

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# 1.

## Introduction

Animal Equality is a leading international animal protection organisation working with society, corporations and governments to enact meaningful changes for farmed animals. Widely recognised for our investigations into intensive animal farms and slaughterhouses, our exposés receive high-profile media attention, with exclusive coverage in The Times, The Independent, Sky News, BBC News, talkRADIO and more, reaching millions of people each year.

In October 2022, Animal Equality, working with the animal protection charity The Animal Law Foundation, released a first-of-its-kind report detailing the current lack of enforcement of animal protection laws in the UK. Entitled 'The Enforcement Problem', this report shows how while animal protection laws are in place, this isn't enough to offer animals protection on the ground, and the current lack of enforcement of these laws is leading to extreme animal suffering. Examples of this suffering have been documented in farms throughout the UK via undercover investigations.

Several issues came to light in this first report. For example, in a four-year period between 2018 and 2021, fewer than 3% of all UK farms were inspected by an official Government body, and only around half of these farms were further inspected after receiving complaints. Shockingly, only one in 300 farms that were inspected were prosecuted following initial complaints.

With over 300,000 farms in the UK, and non-compliance with animal protection laws so widely documented, the scale of this issue is something that must not be ignored.

This report, entitled 'Law and Disorder: The Enforcement Solution', looks towards action on how to solve The Enforcement Problem.

This report sets out how a lack of enforcement of animal protection laws can be addressed in an efficient and logical way. Given the scale of this industry and the issues identified, the problems within the existing system cannot be solved overnight. However, the carefully considered recommendations offered in this report will go a long way to equip policy-makers and regulatory bodies to make the critical progress needed to move in the right direction.



By its very nature, industrialised animal farming exists purely to commodify animals; the millions of animals confined in the system every year cannot be left solely under the watch of the industries using them for meat, milk, eggs and more. Animal protection laws are in place for this very reason, yet there is an abundance of evidence, gathered and presented in Animal Equality's initial joint report with The Animal Law Foundation, demonstrating that non-compliance is rife and that there is a troubling lack of oversight of the animal agriculture industries. The current framework is failing animals and consumers, and the UK's reputation hangs in the balance. As a nation claiming to be a leader in animal protection legislation, this is something we can and must work to overcome.



Some of the Animal Equality UK team at the parliamentary event to launch 'The Enforcement Problem' report. From left to right: Akira Francis Grant; Chloe Coules; Tim Ridgway; Abigail Penny and Jenny Canham.





2.

## The Enforcement Problem

Animal Equality, working in partnership with The Animal Law Foundation, launched a report in October 2022 entitled 'The Enforcement Problem'. This report was the first time that data, statistics, and evidence from undercover investigations had been put together to show the extent to which animal protection laws are currently (under) enforced in the UK.

We encourage you to first consider The Enforcement Problem before reading further.

Overview of the problem and our key findings:

- There are approximately 300,000 farms in the UK, but on average, fewer than 3% of those farms were inspected by an official Government body between 2018-2021
- It is estimated that there is only one inspector in place for every 205 farms in the UK, and in reality this figure is likely lower, as many inspectors work part-time or are shared between multiple local authorities
- There are over 180 taxpayer-funded bodies responsible for overseeing farm welfare policy enforcement in the UK
- On average, over a four-year period, when complaints relating to concerns over animal welfare or health were received, only 50% were subsequently inspected. Of those inspected, illegalities were identified in approximately one-third of cases
- Just one in 300 farms were prosecuted for animal abuse following initial complaints received
- Court prosecutions are not the only form of formal legislative action that can be taken when breaches are found; legislative enforcement can also include official notices, but even these are used sparingly. In 2020, approximately 1% of complaints led to prosecutions and 1.76% prompted improvement, care or compliance notes; the remaining 97.24% did not result in any form of legislative enforcement action
- Across 65 investigative exposés between 2016-2021, illegality, prolonged suffering and / or substandard practices were found on every occasion, yet over 60% of cases resulted in no subsequent formal enforcement action:



1. Chickens were filmed struggling from broken legs, organ failure, footpad dermatitis and body burns, yet 100% of investigations led to no formal enforcement action
2. The collection of footage also disclosed cows being hit with sharp objects, calves being thrown onto the floor, and lame cows forced to walk, with 66% of cases seeing no formal enforcement action
3. Piglets were evidenced to have had their tails docked in 85% of investigations, but not one prosecution was pursued in relation to this offence
4. Despite a series of 12 investigations into slaughterhouses showing animals being plucked alive, left to suffocate, thrown into boiling water without prior checks for vital signs and more, two-thirds of cases resulted in no formal enforcement action being taken.

The findings garnered by Animal Equality and The Animal Law Foundation demonstrate that non-compliance with animal protection law is endemic on UK farms, across all production systems, as evidenced time and time again through undercover investigations; this evidence is now further bolstered by the data revealed in this report. The Enforcement Problem exists across all areas of animal law, but what makes it particularly jarring for farmed animals is not only the extent of the problem, but the proclamations that the UK has some of the highest animal welfare standards on farms and slaughterhouses in the world. If these standards only exist on paper and are not upheld in practice, the value of those laws is rendered questionable at best and redundant at worst.

'The Enforcement Problem' has received widespread acclaim from experts, politicians, celebrities and the public alike. The report was released via a Parliamentary reception hosted by Sir Roger Gale MP, with politicians, Government officials, experts in animal law and animal welfare, and representatives of animal protection organisations all in attendance.

The success of this report, partnered with over 75,000 petition signatures as of February 2023, shows that something must be done to address this problem - now is the time for action. Now is the time for a solution.





From left to right: Professor John Webster, MA, Vet MB, PhD, DVM (Hon), FNS, MRCVS and Founder Member of the Animal Welfare Committee, originally named the Farm Animal Welfare Council, and Peter Egan, celebrity and animal advocate.



From left to right: Sir Roger Gale MP; Edie Bowles, Managing Director and Solicitor at Advocates for Animals; Abigail Penny, Executive Director at Animal Equality UK and Peter Egan, celebrity and animal advocate.



3. ■

The Enforcement Solution

## 3.a. The Need for Licensing of Farms

Farms are one of the few animal industries that do not require any form of registration or licensing for welfare purposes. Licensing and approval systems are required for other animal industries such as pet shops, zoos and animal research, as well as other professions such as dentists, doctors and lawyers. It is a clear oversight issue that so many establishments responsible for rearing huge numbers of animals - in many instances tens if not hundreds of thousands of animals - for commercial purposes can currently continue practising without any form of authorisation.

With legal guidance from the law firm Advocates for Animals, Animal Equality proposes within this report that a new framework is put in place to replace the existing fragmented and disorderly approach, in the form of a licensing system.

A licensing system for all UK farms is a logical and effective way to create a robust framework where laws are being appropriately monitored and adhered to.

The licensing system, much like any other already in existence in the UK, must ensure that:

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- All farms are required to pay for a licence to operate, and the licence fee must fully or partially cover the costs of increased inspections from Government officials. These costs are a reasonable requirement for any animal agricultural business to continue operation, and should not be an additional expense to the Government purse or taxpayers
  - All farms receive an official Government inspection at least every 1-3 years, depending on the farm's size and number of animals held
  - Inspections are robust, and conducted against a clear set of species-specific welfare criteria, and where possible unannounced
  - Appropriate penalties for all farms found not complying with their licences and the law are strictly enforced in all cases, such as fines, suspension, non-renewal, or prosecution.
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## 3.b. How a Licensing System Will Work

### i. Monitoring and Oversight

Official monitoring is an area that is currently being overlooked; it poses the problem that potential animal abuse, illegality and cruelty is very likely going entirely undetected and unpunished.

The current official monitoring system for animal welfare on farms is largely centred upon inspections, however it is risk-based, meaning that those facilities considered to already be 'high risk' are prioritised, leaving the vast majority of farms unaudited. The risk-based approach is failing. The number of inspections conducted is extremely low - on average, over a four-year period, just 2.95% of all UK farms were inspected by a Government body. By prioritising the auditing of farms considered 'high risk', the majority of other farms are left unchecked, meaning there is potential for farmed animal suffering to go entirely undetected (and unprosecuted) in these cases.

A licensing system will ensure that this area is improved by mandating more frequent and more unannounced inspections, against a set of species-specific welfare criteria (see more below).

### ii. Suspensions and Revocations

Without a real risk of consequences, as is currently the case, there is little to deter ongoing violations of animal protection laws that are in place. When fewer than 1% of complaints lead to prosecutions, those within the animal agriculture industry will be acutely aware that illegality is unlikely to result in any meaningful form of legal enforcement action. Where laws are broken, consequences must be faced; this is not happening at present.

Laws mean very little unless they are partnered with appropriate sanctions, so it is crucial that fines, suspensions and revocations of a licence are included and used as appropriate penalties for non-compliance with animal protection laws. Non-compliant producers not being able to continue their commercial activity will send a clear message that animal welfare abuses on farms will not be tolerated.

### iii. Working with Current Legislation

The Animals (Penalty Notices) Act 2022, exists to improve enforcement of animal protection laws, however, as evidenced in 'The Enforcement Problem' report, such legislation in isolation is not enough to ensure that animals are receiving the protection that these laws were enacted to provide.

Ayesha Smart, Barrister and legal expert specialising in animal welfare, discusses why penalty notices must be partnered with a licensing system.

*'The primary mechanism to address the lack of compliance in the farming industry and to enforce breaches is clear – the introduction of a licensing regime.'*

*By regulating the farming industry in this way, and bringing it in line with the majority of modern professions, it ensures that those who are circumventing the law are prevented from continuing to operate. Penalty notices can be used as a secondary tool to capture the more 'minor' breaches in law and/or first instance offences where ordinarily no further action would often be taken.*

*Currently, the responsible charging bodies have the option to "do nothing" or prosecute.*

*Penalty notices provide a better solution than "no further action". It would also provide substance for later prosecutions where there has been a history of non-compliance.*

*Penalty notices allow for 1) firmer enforcement of the law, 2) promotion of compliance and 3) maximising the deterrent effect of enforcement action. The process would also be a transparent one, whereby the regime for imposing a penalty notice and the methods of challenge would be available on the responsible body's website. Penalty notices would also allow for a more consistent approach to enforcement for similar types of offending country-wide where there might ordinarily be inconsistency due to time-constraints, financial resources and/or the local government practices.*

*One can simply look to the current regimes for road traffic offences, environmental offences and the Covid-19 fixed penalties to see how this satisfactorily operates in practice. The responsible body could impose fixed penalties for certain offences with incremental increases for repeat offending or impose offender specific penalties whereby harm, culpability, mitigating factors and/or means can be considered.*

*This would operate seamlessly and efficiently - it could be as easy as an online system, as with traffic offences, where the preliminary evidence is uploaded and the offence can be accepted or denied. Failure to admit or deny the offence within a stipulated time period could result in an automatic penalty.*

*The admission of guilt and/or penalty could show up against the offending farm/offender but not necessarily in a criminal record.*

*However, this alone doesn't necessarily provide farmed animals with increased protection. Multiple notices penalise but they don't prevent an offender from resuming their poor practice alone, although the financial hit may encourage better compliance in future.*

*There is the option to have the responsible body specify the number of breaches before a referral for prosecution is made and/or have the discretion to refer particularly serious breaches onward for enforcement action. However, the best way to ensure that repeat breaches are not tolerated is for there to be ramifications on the offenders ability to practise i.e. by way of licensing. Even if prosecuted, an offender could go to prison, or complete a community penalty, but still be able to work in farming and commit the same offences that they did previously.*

*Penalty notices would work well with a licensing system as such notices could be considered at the point of renewal of any licence, and dependent on the number or severity of breaches, any misconduct can be put to a stop.'*

# 4.

## Key Recommendations



With any licensing framework put in place, suitable licence conditions must be attached.

## 4.a. General Licence Conditions

### i. Record Keeping

All farms must keep adequate prescribed records on the numbers, identification, health, and welfare of their animals. These records shall be made available to the Department for Environment, Food and Rural Affairs (Defra) annually, and appropriate action should be taken against any farm with a systemic problem, or that fails to meet requirements.

### ii. Inspections

Official inspections must take place ahead of licensing and renewing the farm's licence, which should take place every 1-3 years. In addition, robust inspections should take place on a regular basis, both announced and unannounced.

## 4.b. Specific Licence Conditions

In implementing increased and more vigorous inspections, Animal Equality would propose that the following species-specific licence conditions are incorporated into any audit check at a minimum, in order to tackle some of the legal violations that are currently especially rife. This of course, however, is not an exhaustive list.

### i. Cows Farmed for Dairy

Cows living on dairy farms are experiencing extreme suffering, due to injuries and illnesses such as lameness. Farmers are required to treat lameness immediately yet are evidently failing to do so. Lameness is being left undocumented and therefore untreated, leading to prolonged and extreme suffering to the animal.

#### ■ Record Keeping:

*It is critical that a record of lameness of cows is kept and that treatment is provided. Records must also be kept for each herd to detail how many cows are bought from market and taken to slaughter. If a cow suffering from lameness fails to respond to medical treatment given and emergency killing is undertaken, this should be recorded, including the date and method of killing used, and precautions that were taken to ensure this method meets the requirement of avoiding pain, distress and suffering as much as possible.*

### ■ *Inspections:*

*There are currently no official routine welfare inspections for cows farmed for dairy, other than at the time of their deaths in the slaughterhouse. This is resulting in widespread issues, such as lameness going undetected. It is essential that dairy farms receive regular inspections from an official body, such as the local authority, which could be provided for under the above licensing system.*

## ii. Pigs

Pigs living on factory farms are suffering from a multitude of animal welfare issues. Although some legislation is in place for their protection, as well as Government Codes of Practice for further guidance, the evidence shows that this is frequently not being complied with.

This is the case with tail docking, a procedure that legally should only be carried out as a last resort, given the extreme pain it causes to pigs. Despite this, multiple investigations have shown that pigs have their tails docked routinely.

Stronger enforcement is essential to ensure compliance with the law.

### ■ *Record Keeping:*

*Given that investigations have consistently shown that tail docking is taking place on a routine basis, instead of as a last resort as required by law, it is essential that detailed records are kept of animals who have had their tails docked, including the measures that were carried out prior to the tail docking taking place, including a reduction in overcrowding on the farm and of increased and meaningful enrichment measures.*

### ■ *Inspections:*

*The extent to which tail docking is carried out is a clear indication of overall animal welfare on a farm. Therefore, where records and inspections reveal that routine and illegal tail docking is happening, these farms should be inspected on a more frequent basis, for example at least twice per year, with appropriate changes being required and appropriate action taken if the issue continues.*

*Post-mortem inspections in slaughterhouses should record the number of pigs' tails that have been docked in each group. The full tail-docking figures must be made publicly available and if tail-docking has occurred, a veterinarian note must be provided simultaneously. Where tail-docking has been conducted without veterinary approval, an increase in inspections must be carried out.*

### iii. Chickens Raised for Meat

With meat from chickens being the most consumed meat in the UK, chickens are currently farmed in overwhelming numbers, most of whom are confined on industrial farms. Undercover investigations carried out over the past few years have consistently shown the rife non-compliance with animal welfare legislation that exists for chickens, yet these issues are not being adequately responded to by authorities.

To help rectify the issue, urgent steps must be taken, namely: 1) improvements to the trigger system to ensure the response to welfare issues is dealt with adequately, and 2) a licensing system to ensure that only the most suitable and trained individuals are able to keep animals for farming.

#### ■ Lower Trigger System Thresholds:

*The official inspection regime for chickens reared for their meat starts in the slaughterhouse, with what is called the 'trigger system'. This system involves an inspection by the Food Standards Agency (FSA) on every chicken, looking for various poor welfare indicators. If specific thresholds for such welfare indicators are breached within any one group of chickens from a chicken shed, a trigger report will be generated and sent to the keeper and to the Animal and Plant Health Agency (APHA). The APHA uses the trigger report information to identify farms at highest risk of non-compliance with current animal welfare legislation, and targets inspections to those farms identified as being at highest risk.*

*The trigger system thresholds must be reduced to ensure serious welfare issues are reported in every case, resulting in inspections and compliance with welfare laws. It is unacceptable that the thresholds are set so high to seemingly avoid addressing the full scale of the problem. The response to non-compliance with welfare standards should be enforcement, not hiding the problem with exceptionally high thresholds.*

*Farms which exceed trigger thresholds will be inspected more regularly and will have their licence suspended or revoked if non-compliance persists.*

## 4.c. Requirements for slaughterhouses

Unlike farms, animal slaughterhouses already require approval, as such the key recommendations are outside of the licensing regime mentioned above.



## i. Land Animals

Multiple investigations have been carried out that document the extreme suffering of animals during the time of killing.

It is essential that enforcement action is brought against those who fail to comply with animal protection laws at the time of killing, and monitoring is strengthened. Although CCTV is currently a legal requirement, this does not extend to all farmed animals such as fish. In addition, the CCTV is currently owned by the slaughterhouse and is only made available to an official body on request within the 90 days it is required to be kept.

The current enforcement of animal protection laws is not providing sufficient protection to animals, resulting in animals experiencing prolonged and extreme suffering during their last moments of life.

The licensing of farms will ensure sufficient information (in terms of quality and quantity) is collected on each animal before arriving at slaughterhouses. Health and welfare should be monitored throughout the animal's life, in order to reduce suffering as much as possible at the time of slaughter.

### ■ *Approval of Slaughterhouses and Certificates of Competence:*

Slaughterhouse approval and Certificates of Competence for those handling, stunning or killing the animals must be suspended if there are welfare violations, and permanently revoked if there is a regular pattern of breaches.

### ■ *CCTV in Slaughterhouses:*

CCTV must be a mandatory requirement in all slaughterhouses. This is currently a legal requirement in England and Scotland, with Wales due to follow suit; however, farmed aquatic animals are currently not included in this requirement. This law should be extended to include all animals who are farmed.

Further to being a legal requirement in all farmed animal slaughterhouses, CCTV must be transferred to and stored by the FSA or FSS (Food Standards Scotland) for at least three years. CCTV footage must be reviewed by the FSA or FFS on a regular basis, with compliance issues from the CCTV footage made available in public reports, which already happens for other compliance issues recorded by the FSA.

Where CCTV reveals evidence of non-compliance with animal protection laws, appropriate enforcement action must be implemented.

### ■ *Welfare Referrals and Enforcement Action*

Welfare referrals to either the local authority or the APHA for issues relating to on-farm welfare or welfare during transport are currently only happening in the event of critical non-compliance in a batch of animals. This threshold for referrals is too high. Welfare referrals should be made whenever there is any evidence of a breach of welfare law originating from either on-farm or during transport.

Similarly, action is only taken in the event of critical non-compliance during slaughter and related operations, as above, this needs to change to whenever there are breaches.

## ii. Fish

We must acknowledge the pain and suffering of fish who are farmed in overwhelmingly high numbers for human consumption. Although fish are, of course, different to other animals in some respects, they suffer and feel pain, much like all animals.

Despite some legal protections, it is evident that there is a serious issue with enforcement of these laws, as 1) stunning is not taking place in all cases, 2) even where it is taking place, it is not always being done adequately, as proven in Animal Equality's undercover investigative footage, and 3) even though they are required, routine welfare inspections are not taking place to ensure compliance with the law.

The evidence shows that a lack of enforcement is causing extensive animal suffering and must be addressed.

### ■ *Inspections in Slaughterhouses*

In November 2021, following a Freedom of Information request submitted by animal protection organisation The Humane League UK, it was confirmed that inspections are not a mandatory requirement for farmed fish at the time of slaughter.

There is a clear need for regular inspections in fish slaughterhouses to be made mandatory across all of the UK. An article published by The Guardian in December 2021 confirmed that there are no routine check-ups on the welfare of fish at the time of killing, as stated by Government officials.

In December 2021, industry publications reported that the Scottish Government was considering enacting welfare inspections, following Animal Equality's high-profile investigative release and following revelations from The Humane League UK that inspections are not currently mandated.

In February 2022, it was confirmed by the Scottish Government via a Freedom of Information request, sent by Animal Equality, that inspections are now a legal requirement in Scotland, as of 1st February 2022. Further Freedom of Information request responses confirmed that five inspections have been carried out in fish slaughterhouses in Scotland in the year following the announcement of mandatory inspections. However, the frequency of such mandatory inspections, going forward, has not yet been confirmed.

Such inspections should take place across the whole of the UK as a matter of urgency.

#### *CCTV in Slaughterhouses*

In 2018, the Mandatory Use of Closed Circuit Television (CCTV) in Slaughterhouses (England) Regulations came into effect. The equivalent Scottish regulations came into effect in 2021. These regulations require a duty to install and operate a CCTV system that provides a complete and clear image of killing and related operations in all areas of the slaughterhouse where live animals are present. This footage must be kept for 90 days, during which time it can be seized and inspected by the relevant authority. In November 2021, the Welsh Government announced that they will also be implementing rules to introduce mandatory CCTV in farmed land animal slaughterhouses.

There is currently no equivalent requirement for fish slaughterhouses to have this same monitoring process in place, although the need for this is clear, as set out in Animal Equality's joint report with The Conservative Animal Welfare Foundation, 'The Case for Regular Inspections and Mandatory CCTV in Fish Slaughterhouses', published in February 2022.

CCTV in fish slaughterhouses must be implemented as a priority, alongside a clear legal framework and publicly-available data regarding compliance issues, such as failure to stun. This is critical in order to evidence that progress is being made to afford aquatic animals the same level of protections as other farmed animals, and so non-compliance and abuse can be identified, and those involved appropriately penalised. Without close oversight from an official body, farmed fish will continue to suffer for a prolonged period of time at slaughter. Significantly enhancing legal protection and supervision in this area of animal farming must be a firm priority for a nation that is so often regarded as a leader in animal welfare.



### *Detailed Requirements at the Time of Slaughter*

Whilst it is arguable that stunning is already required to prevent avoidable pain, distress or suffering, the fact that there are no official detailed requirements, either in regulations or guidance outlining what a slaughter operator's requirements are to comply with the law at the time of killing is causing confusion and widespread unlawfulness. This is evidenced by Animal Equality's investigation which demonstrates that even where stunning is taking place, there is still a lack of skill and precision throughout the process. Detailed requirements would go a long way to monitor and mitigate many of these issues.

If the majority of the industry has already put in place the 'latest and best technology at slaughter', as industry representatives claim, legislating stunning as a requirement is a necessary and obvious next step.



# 5.

## Conclusion

Given the widespread outrage from politicians, celebrities and the public following the lack of enforcement of animal protection laws revealed in the first-of-a-kind report, 'The Enforcement Problem', by Animal Equality and The Animal Law Foundation, it's clear that swift action must be taken.

There are nearly 300,000 farms in the UK, but between 2018 and 2021, only an average of 2.95% were inspected by public bodies. Over the past five years, at least 64 covert investigations have been conducted; in every case some form of illegality was witnessed, including direct cruelty to farmed animals, untreated lameness, mutilations without anaesthetic, ammonia-caused body burns, prolonged suffering at slaughter, and more.

The rate of official inspections means this kind of illegality is going undetected, and therefore, unpunished. Even where illegality is filmed and reported to the relevant authority, our data shows that over 60% of cases led to no legal remedial action, and an average of just 0.33% of complaints led directly to a prosecution between 2018 and 2021 in the UK.

With a whole host of actors responsible for legal oversight and enforcement of animal protection laws – including around 174 local authorities – inconsistencies and confusion have arisen.

These findings are alarming and should be a red flag to any consumer or policy-maker. It's clear we need more order by way of stronger enforcement, if we are to make sure the UK's animal protection laws are fulfilling their purpose of protecting animals.

As a first step, Animal Equality recommends that a licensing system be made a legal requirement across all UK farms within the next three years. This will address several of the issues that are currently leading to poor enforcement, and more suffering for farmed animals.

While a licensing system should be made a priority to be achieved in the short-term, we must also question to what extent high welfare can ever be achieved with the ever-increasing number of animals living in cramped conditions across factory farms in the UK. To address this, the UK Government must simultaneously work to support farms to transition to plant-based farming systems, in order to reduce the unsustainable demand on animal agriculture, and to protect the planet as well as animals.

### a. A Look to the Future

A licensing system is a solution that will address many of the issues with the enforcement of animal protection laws that are currently leading to extreme suffering, and should be seen as a short-term goal to implement within the next three years. However, it's important we also look towards a longer-term solution, and support farmers who are transitioning to plant-based food production systems.

Around two-thirds of farmed animals are living on factory farms, which is the equivalent to nearly 50 billion animals worldwide. With this number continuing to rise, this leads us to question to what extent animal welfare can ever be guaranteed with such a high number of animals living in unnatural conditions and overcrowded factory farms.

Many farmers rely heavily on financial provisions to keep their businesses alive – from tax breaks to grants and subsidies. British dairy farmers, for example, received over £56 million annually in direct Government payments over recent years, making up nearly 40% of their profits. In early 2022, the Government backed the £1 million 'AHDB dairy campaign' to boost dairy milk consumption, as well as providing dairy farmers with access to an additional £27 million under the Farming Investment Fund to cover costs of new equipment and infrastructure.

By supporting farmers to transition to plant-based agriculture and using taxpayer money to subsidise plant-based alternatives, fund rewilding of land, and incentivise farmers to transition towards arable farming, the Government can address animal welfare as well as climate and consumer concerns.

### b. Key Recommendations Summarised

1. Licence all farms, giving public bodies a more uniform approach to regulating farms, greater accessibility to data, and the power to suspend or revoke licences where deemed necessary
2. Enhance record keeping to be shared with a public body, including documenting:



- Lameness in cows and the treatment provided
  - Where lameness prevails, how many cows were killed on-farm in an emergency
  - Number of cows bought from market and taken to slaughter
  - Pigs who have had their tails docked and measures taken prior to the docking. Where any given farm docks 20%+ of pigs, a report should be generated and shared with the relevant public body and increased inspections conducted as a result
3. Mandate non-risk-based routine welfare inspections of all animal facilities, including for aquatic animals. These inspections must include unannounced visits and be made more robust, e.g. by including measuring species-specific welfare criteria. These must be carried out by an official public body
  4. Implement lower trigger system thresholds for chickens bred for meat to prevent under-reporting of welfare issues
  5. Make CCTV in fish slaughterhouses mandatory
  6. CCTV footage from all slaughterhouses, both terrestrial and aquatic, must be made available to the relevant public body, and compliance issue data from the footage must be made publicly available
  7. Make it a legal requirement to stun fish at the time of killing to ensure compliance with the current requirements to avoid pain and suffering
  8. The relevant body must take action whenever a breach is identified in a slaughterhouse, including suspending slaughterhouse approval and individual Certificates of Competence; these must be revoked entirely where a pattern of breaches emerges
  9. Wherever a breach of welfare law is identified, whether it originated on-farm or during transport, a referral must be made to the relevant authority
  10. Steps must be taken to support farmers transitioning away from animal agriculture and towards plant-based farming systems to achieve climate and animal welfare goals

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A report by Animal Equality UK

● F E B R U A R Y 2 0 2 3 ●

## With thanks:

Advocates for Animals, Animal Justice Project, The Animal Law Foundation, Ayesha Smart, The Conservative Animal Welfare Foundation, and The Humane League UK

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