

## **Campaign for Local Abattoirs**

The Campaign for Local Abattoirs is a recently formed alliance consisting of the Sustainable Food Trust, the National Federation of Meat and Food Traders, Fir Farm, Pipers Farm, Mettricks Butchers, Tideford Abattoir, Natasha Jenkins, and others.

### **Response to Health and Harmony: the future for food, farming and the environment in a Green Brexit**

#### **Introduction and Summary**

The Health and Harmony Command Paper only refers to slaughterhouses/abattoirs in the context of the introduction of CCTV in England and the better use of contracts and grading systems. The government seems to be unaware of the considerable economic, animal welfare and environmental problems currently being caused by the continuing high rate of closure of small abattoirs, and the extent to which, without Government intervention, this trend will continue, and undermine many of the aspirations of the Command Paper.

Between 2007 and 2017 a third of small abattoirs closed down, from already low numbers, three more red meat abattoirs have already closed this year (two of them low throughput) and others are known to be considering closure. As a result some producer-retailers are unable to continue in business and others feel they will be forced to close down.

The Command Paper acknowledges that, “A high proportion of farmers currently depend on Direct Payments just to break even”, and that “Those sectors in which a high proportion of farmers currently depend on Direct Payments just to break even are often located in the most remote... parts of the UK.”

As Defra is aware, economic pressures on livestock farmers in particular have driven many thousands of beef and sheep farmers out of business over recent decades. A high proportion of those that remain have only managed to develop profitable businesses through innovation, in particular by adding value to their produce by on-farm meat processing, and by adopting high welfare and/or environmental production methods, allowing them to market the meat direct to the public, often at premium prices. Much of this has been made possible by public money in the form of rural development grants and other grants under various diversification schemes, to establish on-farm cutting plants and through agri-environment schemes, which have supported the transition to less intensive production methods.

However, all these inspiring businesses are totally dependent on the availability of local abattoirs, since they generally slaughter relatively small numbers of animals each week, and the costs per animal of transporting them long distances and returning the carcasses take a high proportion of the profit.

This response details the current situation, the public good provided by local abattoirs, some of the reasons behind the problem and what can be done to ensure the survival of a network of small abattoirs.

## **The Current Situation**

In 2017 there were just 63 low throughput abattoirs (those slaughtering less than 1,000 LSUs a year) and 49 medium throughput abattoirs (those slaughtering between 1,000 and 5,000 LSUs per year, 112 smaller slaughterhouses in total. These were responsible for 6.1% of cattle slaughtering and 1.2% of sheep slaughtering, but close to 100% of all slaughtering for producer-retailers. During the previous decade 33 smaller abattoirs closed, all of them low throughput – a 34% decline in the smallest abattoirs and a 23% decline in abattoirs undertaking private kill (i.e. slaughtering livestock for producer-retailers and making the carcasses and offal available to them).

This is not just an issue for existing producer-retailers, however. All livestock farmers need access to local slaughtering facilities to take occasional casualty animals and legislation requires that where casualty slaughter takes place on the farm after ante-mortem inspection by a veterinary surgeon the slaughtered animal must arrive at an abattoir for evisceration and skinning within one hour, a target it is now impossible for many producers to meet.

The full significance of this can be gauged when it is recognised that well over two-thirds of UK farmland is under grass. The total area of grassland in the UK, including single use and common rough grazing is 12,422 hectares<sup>1</sup> (71.5% of the total utilised agricultural area). Most of this land is stocked with grazing cattle and sheep. In addition, 10,000 hectares is used for outdoor pig production, most of this to enhanced animal welfare standards. The adequate provision of accessible abattoirs for these and other farm animals is one of the most essential requirements of the sector.

## **The importance of local abattoirs**

All livestock farmers need access to local slaughtering facilities for casualty slaughter. Producer-retailers need access to them on a regular basis for selling traceable meat from their own animals. This enables the local marketing of meat, which often has high welfare, organic, grass-fed, rare breed or heritage breed status.

Without these smaller local abattoirs there is no way of selling local traceable meat.

Such businesses provide additional employment in rural communities where good jobs are often hard to find, and they keep a high proportion of the money within the rural community where its economic benefits are four times higher to

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<sup>1</sup> Defra (2016) 'Agriculture in the United Kingdom p15, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/672119/AUK-2016-08jan18.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672119/AUK-2016-08jan18.pdf)

the community than when the meat is processed and marketed outside the region.<sup>2</sup>

Local abattoirs help local independent butchers shops to compete with supermarkets by providing them with locally produced meat and they play a vital role in maintaining livestock breed diversity and encouraging tourism.

Local abattoirs also provide work for local electricians, refrigeration engineers, and plumbers.

We believe there is considerable scope for the greater use of certain low-grade abattoir wastes on local farmland as fertiliser, without any impact on food or environmental safety.

At present, the significant benefits of smaller abattoirs, their catalytic effect on the local community and economy and the extent to which they are a central part of an inter-connected web of economic, environmental, biodiversity, social and cultural benefits is not recognised or rewarded. It is important that the positive impacts of smaller abattoirs are more fully understood, and some long-term financial benefits made available in order to reflect the public goods they produce and to offset the negative impacts of higher costs, lack of economies of scale and often remote locations.

### **The impact of small abattoir closures**

Where local abattoirs close, traditional livestock farms find it even harder to survive. At a national level they tend to be replaced by large-scale beef units, but these are not generally situated in the traditional livestock regions but instead are established in grain-growing regions, with sometimes several thousand cattle housed at a single site in something close to US feedlot conditions, though often under cover due to the higher rainfall levels in the UK. In conventional terms such systems have greater economic efficiency. Yet in terms of the public goods they provide such systems are highly inefficient.

Because these animals do not graze pastures they fail to provide many of the benefits associated with traditional livestock systems. In addition, they are often a greater source of air and water pollution.

The Secretary of State for the Environment, Food and Rural Affairs, Michael Gove MP recognises the importance of sustainably produced, high quality British meat, and the fact that "Livestock farming contributes to the mixed farming methods that provide a specific set of environmental benefits." We therefore consider it is essential to address the loss of local slaughter facilities in order to sustain a profitable future for UK livestock farmers.

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<sup>2</sup> 'The Money Trail', New Economics Foundation, December 2002

The loss of smaller local abattoirs also has wider repercussions. Ancillary businesses, particularly those which base their business plan on selling or further processing local meat, are at threat of loss of their raw materials if it is uneconomic to transport animals the distance to the next nearest suitable abattoir. Local restaurants which highlight local, traceable meat may suffer loss of custom if they can no longer guarantee the origin of their meat. Many types of local food shops differentiate themselves from supermarkets by offering customers traceable meat from local farms. There are many new small charcutier, sausage and other meat product businesses which have recently started to make these specialist products, with claims of local provenance. With no other local slaughtering facilities, all these businesses are threatened.

### **Reasons for the closures**

The driving factors behind the closure of so many smaller abattoirs over the past decade in particular are complex and need careful examination and analysis.

However, a number of major reasons can be summarised as:

1. Strong downward pressure on profitability from high volume abattoirs supplying mass markets at low margins,
2. Increased costs of waste disposal,
3. Excessive regulation hitting smaller businesses disproportionately,
4. Low prices paid to small abattoirs for hides and skins,
5. Planning hurdles which face those seeking to establish new small abattoirs.

The essential problem is that smaller, local abattoirs with short, local supply chains and markets, are forced to operate in a legislative and commercial environment which is designed for the high-volume operators, whose structure, management, methods, supply chains and markets are totally different from those of the traditional smaller local abattoirs. This puts the smaller plants at a built-in financial disadvantage, with no balancing benefits for the significant public goods they produce.

### **Our proposed solutions**

A new approach to the regulation of small abattoirs is urgently needed, and must be genuinely based on risk rather than the blind imposition of regulations even when they are inappropriate or unnecessary. Without a radical overhaul of the regulations there will be no small abattoirs left in many regions of the country.

There is an emerging consensus that this is a priority issue, but it must be approached systemically, rather than simply making random small changes. This is possibly the last chance for government to take action that will enable our network of these essential smaller abattoirs, which are the basic infrastructure required for local, traceable meat, to be sustainable in the long term.

The recent Sustainable Food Trust report (A Good Life and a Good Death<sup>3</sup>) concludes by making three major recommendations for government action:

1. **Publicly recognise the importance of maintaining a national network of smaller abattoirs** for the public good they produce, and for the delivery of local, traceable meat, because many farmers have been paid public money to diversify into selling their own meat and to make this a matter of practical policy across all government levels.
2. **Undertake, or set up, an urgent in-depth review with a view to**
  - a. Identify and address the underlying problems facing the smaller abattoir sector in the UK
  - b. Determine measures which would significantly slow the rate of abattoir closures
  - c. Where geographical blackspots exist in the UK, propose how these can best be remedied so that private kill services become available.

### 3. **On-Farm Slaughter**

Consider what practical help the Government could provide, in terms of both capital costs and simplified regulations, to facilitate the introduction of new small abattoirs, mobile abattoirs and on-farm small static abattoirs in areas currently without local slaughtering facilities.

The following pages give a number of proposals for specific solutions to the problems faced by smaller abattoirs, but the examples are not exhaustive.

Whilst the Campaign for Local Abattoirs will continue to work with its partners in seeking further solutions, it is to be hoped that the in-depth review called for above will enable a systematic analysis of the problems and appropriate proposals for the solutions.

## **Animal Welfare**

*CCTV in slaughterhouses* - CCTV presents an opportunity to make use of high definition technology to carry out some ante mortem and meat inspections remotely, and improve the level of monitoring the animal welfare of smaller abattoirs.

FSA data<sup>4</sup> shows that the system of ante-mortem inspection of animals in smaller abattoirs has resulted in negligible numbers of animals being rejected as unsuitable to enter the food chain. In the first 9 months of 2014, none of the 22,679 cattle, 0.015% of 314,814 sheep and 0.011% of 160,668 pigs were rejected in abattoirs up to 5,000 LSUs. This is a good example of disproportionate regulation, and according to the International Butchers

<sup>3</sup> <http://sustainablefoodtrust.org/wp-content/uploads/2013/04/Re-localising-farm-animal-slaughter-low-res.pdf>

<sup>4</sup> Results of National Federation of Meat and Food Traders FOI request on proportion and causes of rejections of livestock in smaller abattoirs.

Confederation, EU countries such as France do not currently enforce it.<sup>5</sup>

We call on the government to consider making the Food Business Operator responsible for ante-mortem inspection in conjunction with remotely monitored CCTV, under veterinary supervision. These steps would ensure that public confidence in our animal welfare standards is enhanced.

*Long distance animal transport to slaughter* - Clearly slaughtering as close to the place of production is better for animal welfare, as the government acknowledge<sup>6</sup>, but to do so requires adequate local slaughtering facilities. If the transport of livestock long distances is to be reduced, and especially the live export of animals post-Brexit, it is essential to ensure that the network of these local facilities is maintained, new ones are built, and that they all perform to a high standard.

*On-farm slaughter* - This is the ultimate in animal welfare at the end of a meat animal's life. This is best achieved by use of a mobile abattoir which travels from farm to farm, or hub to hub, where a number of local farmers can bring their animals for slaughter. This method minimises or eliminates the need for transport to slaughter, and the animals are killed with the minimum of stress, and processed on-farm. Whilst the demand amongst some consumers for meat that has been produced in this way is already evident, the ability to develop a financially viable model for a mobile abattoir is restricted by current interpretation of legislation (see Changing Regulatory Culture below). This needs urgent review and action.

*Animal welfare as a public good* - There is considerable public demand for high standards of animal welfare. By publicly recognising the importance of local, smaller-scale slaughtering facilities and acting to protect and enhance them, the government would demonstrate its commitment to animal welfare. Apart from much reduced travel times, smaller local facilities often provide a less stressful environment, more attentive staff and a more personal experience for the farmer.

*Targeted payments to farmers who pilot schemes that deliver higher welfare outcomes* - Schemes offered to farmers to improve welfare should include the possibility for on-farm slaughter, including those who wish to establish permanent facilities to slaughter on-farm as well as those exploring ways to create a mobile abattoir.

*Clarity of information for consumers* - Information on different welfare standards can sometimes be confusing and unclear for consumers. The public has an

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<sup>5</sup> The French currently make use of flexibility in EU Regulation 854/2004. It is set out in French Government document DGAL/SDSSA/N2010-8171. (Source: National Federation of Meat and Food Traders)

<sup>6</sup> "The UK Government would prefer animals to be slaughtered close to the point of production" From: 'A call for evidence on controlling live exports for slaughter and to improve animal welfare during transport after the UK leaves the EU.' Defra, April 2018

expectation of high animal welfare standards and consumers want to know what they are buying. To maintain this reasonable expectation, it is important to support smaller abattoirs which provide the link between the local farm and the production of local meat for the public. A less intensive system of producing and processing the meat and perceived better animal welfare through less transport to slaughter, coupled with a simple short supply chain that's easy to follow, will enhance our existing reputation for world leading standards.

To enable consumers to make an informed choice, we propose a separate health stamp for meat that has been slaughtered locally so that consumers know they are buying meat that has not only been produced to a high artisan standard, but also with minimum live transport of animals.

*Reduction in endemic and contagious disease* – Minimising the distance that animals must travel for slaughter reduces the risk of spreading diseases such as Foot and Mouth Disease, were another outbreak to occur, something which could save the government and taxpayers a vast amount of money and many farmers a great deal of stress and heartache. Shorter journeys also mean that animals arrive at the abattoir with less faecal contamination,<sup>7</sup> and therefore pose a lower health risk to consumers and abattoir staff. Smaller facilities with fewer animals will also reduce the risk of disease. Again, on-farm slaughter, using a mobile abattoir is the ultimate in this regard, with no mixing of animals, as is the case in a normal abattoir.

## **Technology and Research**

Livestock health and animal welfare are issues that should be prioritised by industry and government research. In this regard, new technology that can improve standards and efficiency in slaughterhouses should be explored, along with the potential for on-farm and mobile slaughter facilities. This requires investment and innovation. Support and funding from government could make a very big difference to the success of these endeavours.

Barriers to adoption of new technology include lack of training for farmers and slaughtermen. Abattoir owners could be more receptive to new systems and technologies, and therefore make their businesses more financially resilient if they were provided some appropriate training and support.

Several areas offer themselves to innovative use of technology within the smaller abattoir sector. The use of CCTV to remotely monitor ante-and post-mortem inspections could reduce costs whilst actually enhancing animal welfare and meat safety. The use of Virtual Reality technology used in remote carcass inspection is, for example, already being investigated by AHDB, This approach could be used beneficially for smaller abattoirs.

## **Labour: A Skilled Workforce**

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<sup>7</sup> 'Safer Eating – Microbiological Food Poisoning and its Prevention', October 1997 Parliamentary Office of Science and Technology

One major difference between smaller, local abattoirs and the mass-production style abattoirs supplying large-scale markets is the skills level required by staff. As with any mass-production system, the largest abattoirs require large numbers of semi- or un-skilled labour to carry out simple, repetitive tasks. Some 75% of this workforce is currently recruited from outside the UK. Smaller abattoirs and meat cutting plants have a different style of working. All workers are required to be skilled in a number of operations, and are expected to be able to carry out a wide range of tasks. These higher-skilled staff are able to earn higher wages than the unskilled workers of the large abattoirs, and these earnings will remain within the local community, as, more often than not, will the profits of the business. This generates other local businesses and benefits the local community as a whole.

The Government's Trailblazer apprenticeships scheme for abattoir workers has recently been approved. The small abattoir sector provides the ideal training ground for apprentices as all the processes take place in a small area where each stage can be taught. Meat colleges use footage from a small abattoir to demonstrate techniques to students and Liverpool University regularly sends veterinary students on placements to small abattoirs.

However, abattoir work is not to everyone's liking, and young people generally prefer cleaner jobs. This, combined with the other pressures on smaller abattoir owners such as frequent inspections, unnecessary and excessive paperwork, often combined with low profitability, means that many abattoir owners are hesitant about passing the business to their children or training and employing new people as they do not feel their business is secure. This must change or we risk losing the vital skills and knowledge passed down through generations. Government policy should reflect the value in public goods which smaller abattoirs create.

Many rural economies are in decline, with shortages of jobs for local young people who must move away to find work. Smaller, local abattoirs, along with their associated businesses, are a key part of reversing this decline. Not only do they provide work themselves, but they enable farmers and other small businesses to remain profitable.

People will be more inclined to enter the farming industry, and farmers more inclined to diversify, if they can start small livestock enterprises and slaughter locally, thereby keeping costs down. Producers need to feel they have the support and infrastructure to run their business ventures.

### **Public money for Public Goods**

The public goods provided by diverse farming landscapes are mentioned in the Command Paper. Appropriately managed grazing livestock provide a wide range of benefits. Many farmland bird species depend on them. They also provide an economic justification for the retention, maintenance and where necessary, re-establishment of traditional field boundaries such as hedgerows, which provide

important wildlife habitat and corridors and also sequester and store significant amounts of atmospheric carbon. Much of this is part of regional cultural heritage and produces a range of cultural and other public goods including:

**Social** – direct jobs and ancillary businesses; greater job satisfaction for artisanal slaughtermen; greater understanding of meat provenance in the community

**Environmental** – reduce food miles, and associated greenhouse gas emissions, and reduced ammonia emissions from more extensive production systems

**Consumers** – local smaller abattoirs are the only route to offering the consumer local, traceable meat; greater choice between meat from different production systems; greater choice of cuts; greater availability of offal

**Animal welfare** – reduced journey times; less stress at loading and unloading

**Economic development** – keeping money within local communities

**Source of product innovation** – smaller companies are often innovators

**Cultural** – greater sense of regional identity associated with local breeds and local farms

### **Supporting Rural Communities and Remote Farming**

As the Health and Harmony paper states, “It is important for rural communities to be sustainable and multi-generational, providing employment opportunities for the young... We want to raise the productivity of rural businesses to improve growth and prosperity across rural communities.”

Many of the social and cultural benefits associated with farming are derived from the livestock sector and from landscapes that depend on grazing animals.

For farmers to continue providing these public goods they must have access to the infrastructure and facilities that enable small businesses to be profitable and sustainable.

Small abattoirs provide a food hub for local meat by providing a service to farmers who depend on them for processing all or part of their stock.

UK Government and EU funding has been given in the past for farm diversification into meat processing and/or retailing which makes use of smaller local abattoir facilities. If sufficient numbers of these facilities close, then the farm retail businesses which rely on them are also under threat of failure, which wastes the public funds originally invested in the diversifications.

The loss of these businesses will also mean severely reduced choice for consumers who wish to buy meat closer to the point of production. Small abattoirs are good for the rural economy and support many local businesses and jobs.

For those living in remote, upland or island communities, local facilities are even more essential. On-farm slaughter could become a key aspect of support for these farms, ensuring their survival and making the farming landscape of the UK more diverse and resilient post-Brexit.

One recent stark example is the closure of the sole abattoir on Orkney. Whilst relatively few animals had recently been processed in the facilities, its loss means that the hard-fought for EU designation of PDO for Orkney Gold Beef and Lamb can no longer be used, as the animals cannot be slaughtered on the island. All slaughter livestock on Orkney must now endure a 10-hour ferry journey and 4-hour road trip 150 miles south to Dingwall for slaughter. Any meat destined for the island must then be returned.

### **Changing Regulatory Culture**

The current regulations governing small abattoirs are based on EU regulations and have been designed around large plants, which have different systems and risk profiles to smaller plants. This has resulted in these regulations being disproportionately burdensome on smaller plants. A review is urgently required of the entire system of records, risks and requirements for smaller plants, focusing specifically on how the required animal health and meat hygiene outcomes can be achieved within the strictures of smaller abattoirs with their particular staffing, costs and facilities, in order to lessen the time and cost burdens on small abattoir operators and the farmers supplying them.

Leaving the EU provides an opportunity to ensure that regulation and inspection can be applied on a risk basis rather than a rule basis. For example, consideration should be given to whether the principles and rules for low-volume poultry abattoirs, which are supervised by Local Authorities could be applied to low throughput red meat abattoirs.

### **Mobile and on-farm slaughter**

The ultimate consumer choice in animal welfare is humanely reared animals slaughtered on their own farm, with no transport involved. This choice should be available to consumers, and with mobile abattoirs already operating across many Western countries, it should be possible to ensure the high standards of meat hygiene rightly demanded by consumers is bureaucratically possible within a system of on-farm slaughter.

In the 1990's there were two operating in the UK, although both proved to be unprofitable. This was for a number of reasons, but a significant factor was the impact and gold-plated interpretation of EU regulations. Two of the highest costs were the required on-farm infrastructure, and veterinary inspection.

We call on the government to ensure that the development of this premium market is not inhibited by unnecessary and inappropriate regulation, and that practical options are developed to enable mobile or static on-farm slaughter of animals to be available to farmers and their customers.

### **Ensuring Fairness in the Supply Chain**

The main problem for livestock farmers in marketing their animals is the lack of a genuine market within the 'supermarket' sector. With effectively only a handful

of volume buyers across the country, there is in effect an oligopoly operating the majority of the market. Even when farmers join together and market to this mass-market collectively, these initiatives are generally not welcomed by the large abattoirs and their customers, who operate a 'divide and rule' approach to their suppliers.

The more options livestock farmers have for marketing, the more likely they are to receive a fair return. To an increasing number of farmers, the only way to opt out of the confinement of the mass market is to find local markets, and sell their meat themselves. The loss of local abattoirs not only reduces their choices, but for those using these establishments to slaughter their animals and return the meat for them to sell themselves, the loss can mean the end of their business. A few examples exist where farmers have jointly invested in an abattoir to circumvent the mass-market, and government policy should encourage this route for farmers.

The concept of a mobile abattoir also lends itself to co-operative or individual ownership by farmers, who effectively would then have control over their whole supply chain, and fewer opportunities for third parties to take out their margin, whilst giving added assurances to their customers.

## **Devolution**

The two areas of the UK which have the greatest scarcity of smaller local abattoirs offering private kill are Scotland and Northern Ireland. Whilst the Welsh government has made a positive gesture by offering smaller Welsh abattoirs a one-off cash payment, welcome as that is, it will act only as a short-term sticking plaster rather than the major analysis and changes which are required. In the past some attempts have been made to assist the smaller abattoir sector, but these have also been piecemeal and short term.

It is essential that the smaller abattoir sector is viewed holistically and UK-wide. It requires a thorough understanding of the reasons for the continuing decline of the sector, and practical and effective measures which will facilitate its long-term sustainability.

Campaign for Local Abattoirs  
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