

## **BVA and AGV response to FSA consultation on early proposals for a future delivery model for FSA-delivered official controls in the meat sector**

### **Introduction**

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The Association of Government Vets (AGV) is a specialist division of BVA representing the views of vets working in UK Government Departments and Executive Agencies.
3. We welcome this opportunity to submit views on early proposals for reform of FSA-delivered official controls in the meat sector. We recognise that the formulation of an outline future delivery model (FDM) is the first stage of reform activity, and we look forward to engaging further once aspects of the FDM have been worked up in more detail.

### **The case for change**

4. We agree that FSA has set out the case for change clearly. We recognise that recent years have seen a number of significant developments, both domestic and global, which are impacting on the UK's food system and increasing pressure on the current delivery model. Of these developments, opportunities and threats associated with Brexit seem by far to be the most significant.
5. In our 2017 report 'Brexit and the veterinary profession' we highlighted the opportunity to develop a strong, competitive and innovative food industry which would enjoy the confidence of customers at home and abroad, recognising that this would require collaboration across the food chain, with beneficiaries, individually and collectively, being held to account for meeting standards. Our report also highlighted that, in order to achieve this vision, there would need to be sufficient numbers of appropriately skilled professionals supported by robust standards and processes.
6. The report went on to recommend that although the short-term goal should be continuing to meet existing standards for food hygiene legislation and enforcement, in the long-term the UK Government should review the regulatory environment to ensure it is properly based on risk whilst maintaining current animal health and welfare standards.<sup>1</sup>
7. Vets working in food hygiene and public health in the UK are vital for the protection of the UK consumer. Whilst recruitment and retention in this sector was undoubtedly an issue pre-Brexit, it was exacerbated following the referendum in 2016 and, as RCVS registration data for EU nationals shows, has continued to grow into a significant concern.

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<sup>1</sup> <https://www.bva.co.uk/media/3107/brexit-and-veterinary-profession-v10.pdf>

8. In our 2020 response to the EFRA Committee inquiry into labour in the food supply chain we highlighted existing reliance on non-UK graduates within the veterinary profession, pointing out that in the meat hygiene sector the reliance was particularly acute. At the time FSA estimated that 95% of the veterinary workforce in abattoirs had graduated overseas, with a clear majority coming from the EU. We were clear that losing these OV's from slaughterhouses would increase the risk of food fraud, provide potential for animal welfare breaches, and jeopardise consumer confidence.<sup>2</sup>
9. We subsequently gave evidence to the EFRA Committee and, in December 2020, welcomed the report which outlined the essential role of veterinary surgeons throughout the food chain and noted the increased pressures on veterinary capacity which would be seen at the end of the Brexit transition period.<sup>3</sup>
10. However, recognition of the problem is only the first step towards a solution and most recently, we have seen Defra progress contingency plans by asking RCVS to admit vets with IELTS level 5 to the temporary register for the purposes of bolstering veterinary capacity for the delivery of official controls. Although the proposal caused some concern that it could represent a lowering of standards, in consultation with our Policy Committee we took the view that it would be inappropriate to oppose a plan which was a contingency measure designed to tackle the FSA workforce deficit. Instead, we supported the proposal with the caveat that it should not lead to a two-tier system and that longer-term there must be innovative solutions found to develop the current model and improve reward and recognition.

## Benefits of the proposed Future Delivery Model

11. The proposed FDM represents a real opportunity to develop a long-term strategy for tackling the human resource issues at FSA. The approach must ensure that veterinary expertise is utilised in a way that ensures real-time improvements to animal welfare and food safety as well as contributing to systemic changes both within the FBO and on farm through better use of data. The veterinary role in supporting and protecting animal health and welfare is critical, and this must remain at the heart of any new model. More widely, the FDM must also be accompanied by a wholesale change in the way undergraduates are taught veterinary public health, and it could be useful to look at the approach taken in some EU countries.

## Objectives of the proposed Future Delivery Model

12. We broadly support the proposed objectives of increasing compliance, enabling business growth, and increasing consumer confidence. However, it is unclear from the consultation paper the extent to which animal welfare improvement is also a driver for the proposed FDM. The programme must ensure that high animal welfare outcomes remain a key focus and that the new model facilitates and encourages FBOs to work with OV's to prioritise animal welfare and shift from seeing regulation as a tick-box exercise. This should be clearly stated in the principles.
13. A sustainable workforce should also be included as an objective for the FDM. Well-supported employees, who are properly remunerated for their professional skills and expertise, as well as provided with clear career pathways should be a key goal, with improved retention as a measure.

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<sup>2</sup> [https://www.bva.co.uk/media/3616/bva-response-to-efra-committee-labour-in-the-food-supply-chain\\_final.pdf](https://www.bva.co.uk/media/3616/bva-response-to-efra-committee-labour-in-the-food-supply-chain_final.pdf)

<sup>3</sup> <https://www.bva.co.uk/news-and-blog/news-article/mps-recognise-critical-vet-shortages-as-end-of-transition-looms/>

## Principles and key elements of the Future Delivery Model

14. We broadly support the seven principles which have been identified by the OTP as the key components required to deliver the desired transformation within the FSA and broader regulatory environment. Animal welfare must be explicitly stated and could reasonably be incorporated into the principle on 'Trust and food safety'.
15. We also broadly support the key elements of the proposed future delivery model, although there are some areas where additional detail or clarification could be provided, summarised below.

### Clearer accountability

16. We strongly support the principle of ensuring clear accountability and agree that a stronger collaborative relationship between FSA and FBOs should increase compliance. The importance of wider collaborative working with all stakeholders including supplier farms should also be included. It would be helpful to better understand how OV oversight for animal welfare will be maintained as FBOs take more responsibility for daily inspection activities, with FSA responsible for assuring this activity.

### Tailored presence

17. We support the principle of tailoring FSA presence in line with the level of risk associated with the individual premises and/or products, with resources weighted more towards those premises which pose a higher food safety risk. However, it would be useful to better understand how FSA will assess the risk status of individual FBOs, ensure that animal welfare is factored into that risk assessment, and respond promptly where the risk associated with a particular FBO increases. We recognise that audit will play a key role, and that premises which have demonstrated systematic and long-term compliance may be subject to lower levels of FSA presence.
18. We also understand that other segmentation data will be used, such as size and throughput. Although we recognise the value of low-throughput abattoirs and the opportunities they may provide to reduce journey times and, in the case of single-species abattoirs, offer purpose-built, species-specific facilities that promote good animal welfare, it is important to recognise that the available data suggests that there is variability in welfare outcomes. FSA's own data from 2019 shows that per one million animals there was a statistically significant difference in level 3 (major) and 4 (critical) animal welfare non-compliances in low-throughput abattoirs compared to that in premises with a greater throughput.<sup>4</sup> As such, we urge caution in the weighting given to size and throughput as indicators of risk.

### Robust assurance regime

19. We support the proposal that FSA will work with other assurance organisations and retailers to share data and intelligence to better target assurance activities. As there is no detail at this stage on exactly how the proposed new FSA Assurance function will work with FBOs, and how the increased assurance activity will be resourced in terms of IT, data, and people it is difficult to offer more detailed comment. We recognise and support the aim of modernising FSA operational capability by making the best use of human resources through the removal of activities which do not add value. We would welcome further engagement on what that looks like in practice and how it will optimise the skills and experience of OVs whilst ensuring that veterinary oversight remains at the core of animal welfare and public health outcomes.

### Transparent compliance

20. We support the proposal to publish and share compliance information as a means of providing retailers and consumers with increased confidence and the ability to make an informed choice. Clearly the type of information and frequency of reporting will need to be

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<sup>4</sup> <https://www.bva.co.uk/media/3664/full-position-bva-position-on-the-welfare-of-animals-at-slaughter.pdf>

considered carefully in order to avoid unintended consequences. For example, publication of information relating to repeat stunning, which is a technical non-compliance rather than an animal welfare non-compliance, could be easily misunderstood by retailers and consumers. In turn this could lead to negative animal welfare outcomes if FBOs seek to reduce the number of repeat stuns applied.

### **Digitised real-time data**

21. We agree that FSA and FBOs should collect data in a digital format that can be used to produce meaningful information, improve animal welfare, and ensure both compliance and food safety. Traceability is also key and there should be strong links with livestock ID programmes. At present, we consider there is a missed opportunity to use the Food Chain Information (FCI) and Collection and Communication of Inspection Results (CCIR) data as a meaningful source of information that could improve animal health and welfare, both on-farm and during preparation for slaughter and transport. If data from the FCI and CCIR were fed back to the farm veterinary practice and transporter, as well as the producer, it could be used to inform future herd and flock health planning at the holding of provenance.<sup>5</sup> To support this the FCI declaration should include a welfare component (based on outcome measures) as well as a recorded assessment of welfare on arrival to the abattoir and assessment of dead-on-arrival animals. This approach also supports the concept of One Health as good hygiene and welfare on-farm and during transport reduce the potential for zoonoses in the food chain and support hygienic production at the abattoir. Data could also help inform the 'payments-by-results' scheme under the Animal Health and Welfare Pathway for England.
22. Illustrating opportunities to influence animal welfare at a farm level as well as in the abattoir setting could help attract more OVs to the role, and more effective collection and utilisation of data is key to demonstrating how the OV role can contribute more widely to improved welfare outcomes.
23. FBO data also has a key role to play in surveillance. In our position on veterinary scanning surveillance, we recommend that the UK Governments should "...increase the coverage of the scanning surveillance network through the use of syndromic surveillance and the repurposing of existing health data or data on clinical disease events eg. health records from private practice, private laboratories, abattoir reports, market monitoring, farm assurance schemes or fallen stock reports."<sup>6</sup>

### **Modernised management**

24. We support the intention to develop a more streamlined management function with digitised capability to promote efficient resource deployment. Increased understanding of the required skills and numbers of people to undertake operational activity presents a real opportunity to deploy OVs to undertake work which utilises their expertise and training and adds value, in the process increasing job satisfaction and therefore retention.

### **Resource capability and capacity**

25. We strongly support the aim of developing a more skilled and resilient workforce and agree that the current recruitment and retention landscape for OVs, necessitates innovative solutions. OVs are highly trained, with multi-species knowledge, and play a vital role in helping maintain public trust and commercial confidence in food production. The World Organisation for Animal Health (OIE) recognises the importance of the role of vets in abattoirs, citing the detection of foot and mouth disease in an abattoir in 2001 as an illustration of the essential role of OVs. Despite widespread recognition of the importance of OVs, we are concerned that the vital presence of the OV in UK abattoirs remains undervalued. There is a need to cultivate positive engagement between FBOs and OVs such that all FBOs, regardless of size, see the value they can derive from OV input and expertise. With that in mind, and recognising that routine inspection work holds little

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<sup>5</sup> <https://www.bva.co.uk/media/3664/full-position-bva-position-on-the-welfare-of-animals-at-slaughter.pdf>

<sup>6</sup> <https://www.bva.co.uk/media/3115/bva-position-on-veterinary-scanning-surveillance.pdf>

attraction for OVs as highly skilled professionals, we agree that it is essential for the right people with the right qualifications to be deployed in the right roles where real added value can be realised.

26. Having an influence on animal health and welfare is an important aspect of job satisfaction for many vets. OVs delivering official controls should feel empowered to make a difference to animal health and welfare through their work, both within the abattoir setting but also at a farm level. Opportunities to work more closely with supplier farms and their vets could bring about animal welfare improvements across the food chain and contribute to increased job satisfaction and therefore retention.
27. Although awareness of the OV function delivering official controls is high, the role is still not attractive to the majority of vets. Whilst there is more that can be done to promote the value of the role, without appropriate remuneration to make the role financially attractive, particularly for recent graduates entering the profession with significant student debts to pay, recruitment and retention will remain an issue. As we recognise in our position on good veterinary workplaces<sup>7</sup>, remuneration can be described as a hygiene factor, as, provided a team member is paid fairly and at market rates, it usually has little impact on satisfaction, motivation, or retention. However, when an organisation does not pay fairly, or a team member does not perceive they have been paid fairly, it can impact negatively. As such, OVs must be properly remunerated.
28. The provision of attractive career pathways is an essential part of fostering retention. Good workplaces have clear career pathways that are an attractive, accessible and attainable professional route for those positioned across all socio-economic demographics, and also recognise and reward both personal and professional development. The FDM should incorporate the principles from our position on good veterinary workplaces, and FSA should adopt the voluntary code as well as encouraging delivery partners to do so.<sup>8</sup>
29. In June 2019 Food Standards Scotland (FSS) ended its contract with Hallmark Meat Hygiene Ltd. FSS's primary objective in making the change to an in-house system was to ensure greater control over ensuring that the food safety and animal welfare standards in Scotland's meat industry were not compromised, and that consumers' interests were protected. The previous contracted-out model had led to unacceptable levels of staff turnover and poor staff retention rates, and the move allowed FSS greater opportunity to offer career development opportunities for veterinary staff.
30. We understand from FSS that current staff retention rates and job satisfaction levels are excellent. Any vacancies created, mainly through career progression within FSS, are quickly filled and the FSS staff survey information suggests job satisfaction levels have improved steadily and remain high. OVs currently sit within the B2 civil service salary scale which ranges between £32,781 to £35,813. There is a 'no redundancy' policy, a civil service pension scheme, 25 to 30 days annual leave (depending on length of service), as well as significant staff training, a career progression programme and a professional fees allowance. OVs are not restricted to one slaughterhouse and veterinary staff can move to EHC hubs in central Scotland as well as into management positions.

## Bespoke delivery regimes for domestic production and export

31. In our 2017 report 'Brexit and the veterinary profession' we highlighted the need to ensure that baseline standards for animal welfare are good enough for trade and regularly updated so that we do not end up with domestic and export standard abattoirs. The report went on to state that OVs are vital in abattoirs and any reduction in their role would be a detrimental step for animal health and welfare, public health, and UK trade. As such we strongly oppose

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<sup>7</sup> <https://www.bva.co.uk/media/3708/bva-position-on-good-veterinary-workplaces.pdf>

<sup>8</sup> <https://www.bva.co.uk/resources-support/practice-management/good-veterinary-workplaces-resources/>

any system that would introduce two standards of production, processing or certification for domestic and export markets because of the increased risk of food fraud, animal welfare compromises and damage to public health guarantees.

32. The FSA consultation document emphasises that there is no planned reduction in domestic standards, however, this does not represent a guarantee that such proposals will not be introduced at a later date. We urge FSA to ensure that proposals bolster the UK's reputation as a global leader in food safety and animal welfare by investing in the veterinary-led team in food hygiene and public health roles for both the domestic and export markets.
33. There is a potential risk associated with making changes to the delivery model when international trade deals are being negotiated. Although support for international trade has been identified as a key outcome for the project it is essential that this is not undermined by suggestions of different standards under the guise of bespoke arrangements. There must be proper scrutiny of standards agreed as part of trade deals, including animal welfare, with veterinary expertise integral to those discussions.