

Association of Independent Meat Suppliers

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AIMS Proposal for Trial of a New Official Control System in the UK

Background

The FSA Board paper 09/09/06 on future meat controls identified two fundamental changes that are needed – more responsibility taken by food business operators and a shift of the role of officials from inspection to verification. Neither of these changes can be achieved whilst maintaining the present control system that has resulted from the transformation of the MHS, and neither will be achieved by seeking to change the current inspection procedures.

Whether officials or suitably trained plant staff carry out inspection tasks does not affect the outcome of inspection in public health terms, as long as there is an effective audit of the procedures. There would be efficiency savings if these tasks were transferred to plant staff, due to more flexible working conditions and the ability to use inspectors to carry out other tasks, but it would require legislative change for red meat abattoirs, and could not be achieved quickly in that sector.

On the other hand, operators could be given the opportunity to take more responsibility for food safety without legislative change, and this would have a very positive impact on food safety and at the same time deliver efficiency savings. AIMS believe this could be achieved under the existing EU rules by separating the delivery of inspection tasks from audit and enforcement, as is the case in Holland.

Problems with the Current System

The principal reason for the current reluctance of operators to take responsibility for both food safety and animal welfare is that the official auditor is permanently present and constantly assessing the operator's controls. Many operators therefore do not see why they cannot rely on officials to spot problems, especially as they are being charged for their presence, and it is naïve to believe otherwise. In the ideal world the operator would carry out the inspection tasks and the competent authority would audit his controls at a risk-based frequency.

In addition to the permanent presence of the auditors, their inexperience is also problematical as it results in a lack of consistency of approach and risk based enforcement. As there are no real critical control points at abattoirs, auditing and enforcing abattoir controls requires considerable judgement that can only come from experience gained in a wide variety of plants at national and preferably international level. The pool of veterinary auditors available with such experience is very limited. In any case, if there were enough experienced veterinarians to station permanently at every abattoir, it would not be cost effective to pay them salaries commensurate with their skills.

Despite hygiene being much more important for public health than inspection, current MHS arrangements do not prioritise between the two. This has resulted in a situation where official veterinarians, who alone can carry out audits, are charged out at a cost only marginally more than meat inspectors.

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Proposed Trial

The AIMS proposal is to carry out a trial in which officials from two completely separate bodies carry out inspection and audit tasks.

In a number of clusters, either the MHS would provide an inspection service, or preferably contractors would undergo a competitive tender to provide such a service to the operator. The audit service would be provided directly by the FSA, or another government department, and would not only audit the performance of the operator, carry out any enforcement, and make recommendations on approval of premises, but would also audit the performance of the inspectorate. It would make appropriate use of announced and unannounced visits to both the operator and the inspection service. A comparison could be made in terms of both cost and effectiveness of controls in trial and non-trial clusters.

Anticipated Results

It is envisaged that the trial will demonstrate:

- Improved hygiene standards in trial clusters due to operators taking greater responsibility;
- More cost effective controls in trial clusters due to reduced OV and MHI costs;
- Improved relationships with industry in trial clusters due to improved consistency of enforcement;
- That the permanent presence of the CA is neither necessary nor desirable for protecting public health or animal welfare.

If the trial is successful and rolled out into the remaining clusters it would provide a system future proofed for the eventual transfer of inspection tasks to industry.

Conclusion

The Advisory Body should make a recommendation to the FSA Board that it should ask the executive to produce a paper on the feasibility of carrying out a trial along the lines proposed by AIMS.