

YMGYNGHORIAD YR ASIANTAETH SAFONAU BWYD

CYNNIG I GYDNABOD STATWS FFERM WARANTEDIG WRTH BENNU AMLDER
ARCHWILIADAU SWYDDOGOL AR Y FFERM YN Y SECTOR LLAETH

TUDALEN GRYNODEB YR YMGYNGHORIAD

Dyddiad lansio'r ymgynghoriad:	Dyddiad cau ar gyfer ymatebion:
17 Mawrth 2010	9 Mehefin 2010

Pwy fydd â'r diddordeb mwyaf yn yr ymgynghoriad hwn?

Ffermwyr llaeth, cynrychiolwyr ffermwyr, prynwyr a phroseswyr llaeth, cyrff gorfodi a'r rheiny sy'n ymwneud â'r Cynllun Ffermydd Llaeth Gwarantedig.

Beth yw testun yr ymgynghoriad hwn?

Cynnig i leihau amllder archwiliadau hylendid swyddogol ar y fferm yn y sector llaeth. Byddai'r lleihad yn cael ei gyflwyno i'r ffermwyr llaeth hynny sydd wedi cael eu hasesu gan Hylendid Llaeth Iechyd Anifeiliaid fel rhai â risg is ac sydd hefyd â statws Fferm Llaeth Warantedig.

Beth yw diben yr ymgynghoriad hwn?

Amcan cyffredinol y cynnig yw leihau baich rheolaethau swyddogol ar ddaliadau cynhyrchu llaeth yng Nghymru a Lloegr trwy gydnabod, lle bo'n gymwys, agweddau hylendid canlyniadau archwiliadau a wnaethpwyd gan Ffermydd Llaeth Gwarantedig, ac ar yr un pryd sicrhau diogelwch defnyddwyr.

Dylid anfon ymatebion i'r ymgynghoriad hwn at:

Vicki Reilly

Y Tîm Amaethyddiaeth

YR ASIANTAETH SAFONAU BWYD

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**A oes Aseiad Effaith gyda'r
ymgynghoriad hwn?**

Oes ✓

Nac oes Gweler Atodiad A i
weld y rheswm

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Clicia ar 'Cymraeg'



At: bawb sydd â diddordeb

17 Mawrth 2010

CYNNIG I GYDNABOD STATWS FFERM WARANTEDIG WRTH BENNU AMLDER ARCHWILIADAU SWYDDOGOL AR Y FFERM YN Y SECTOR LLAETH

MANYLION YR YMGYNGHORIAD

Yr Ymagwedd Fferm Gyfan a Chydnabyddiaeth a Enillir

1. Mae Strategaeth Llywodraeth Cynulliad Cymru ar gyfer ffermio, sef 'Ffermio, Bwyd a Chefn Gwlad: Creu Dyfodol Cadarn' yn cefnogi Strategaeth 5 Mlynedd Defra, sef "Putting Sustainable Development into Practice in Farming, Food and Animal Health and Welfare". Ei nod yw:

- Lleihau biwrocratiaeth a chostau rheoleiddio, i ffermwyr ac i'r llywodraeth.
- Gwella record ffermio o ran yr amgylchedd ac iechyd a diogelwch, drwy hybu arferion gwell ar y fferm.
- Symleiddio a thargedu gweithgaredd gorfodi ar sail risg.
- Meithrin perthynas newydd gyda ffermwyr, sy'n canolbwyntio ar gwsmeriaid.

2. Fel rhan o'r ymagwedd hon, mae'r Prosiect Archwiliadau ar y Fferm yn datblygu strategaeth i integreiddio ymweliadau ar y fferm i gynghori a gorfodi, er mwyn lleihau'r baich ar ffermwyr a gwella gwerth am arian cyhoeddus. Bydd yn gwneud hyn drwy'r canlynol:

- Ymweliadau archwilio ar y fferm wedi'u symleiddio lle bo modd, gan gynnwys y sector rheoleiddio a'r sector gwirfoddol, gan arwain at weithio'n fwy effeithlon yn yr adran a chyrrff cysylltiedig a llai o faich ar ffermwyr.
- Data archwiliadau'n cael ei rannu i leihau dyblygu gwaith archwilio ac i leihau'r baich ar ffermwyr ac i alluogi rheolyddion i greu proffil risg ar gyfer busnesau fferm unigol.
- Amserlennu ymweliadau angenrheidiol yn well, gan gynnwys mwy o gydgyssylltu rhwng adrannau/asiantaethau er mwyn lleihau effaith ymweliadau ar ffermwyr.



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Nodwyd nifer o ddewisiadau ar gyfer prosiectau peilot posibl, ac un ohonynt oedd gweithgaredd archwilio yn y sector llaeth.

3. Ar hyn o bryd yng Nghymru a Lloegr, mae daliadau sy'n cynhyrchu llaeth yn cael archwiliadau statudol gan lechyd Anifeiliaid, Hylendid Llaeth (AHDH, ar ran yr Asiantaeth Safonau Bwyd, i weld a ydynt yn cydymffurfio â deddfwriaeth hylendid bwyd¹. Mae'r rhan fwyaf hefyd yn cael eu harchwilio i weld a ydynt yn cydymffurfio â safonau'r cynllun gwarant ffermydd gan Ffermydd Llaeth Gwarantedig (ADF). Mae yna ddarpariaeth yn y ddeddfwriaeth² ar gyfer cydnabod y fath raglenni sicrhau ansawdd preifat wrth i reolaethau swyddogol flaenoriaethu risg. Mae'r Asiantaeth Safonau Bwyd wedi cymhwyso'r egwyddor hon i reolaethau swyddogol yn y sectorau cynradd hynny lle nad oedd gofynion o ran hylendid bwyd wedi bod yn gymwys cyn cyflwyno rheolaethau hylendid newydd yn 2006 ac mae bellach wedi asesu a ellid ymestyn yr ymagwedd i'r sector llaeth lle mae rheolaethau swyddogol ar safleoedd cynhyrchu llaeth wedi eu sefydlu ers blynyddoedd lawer.

Cynigion

Prif gynigion:

- **Bydd ffermydd llaeth a ddsbarthwyd i Gategori 4 (risg isaf) yn eu harchwiliad diwethaf gan AHDH ac sydd â statws ADF yn cael archwiliad swyddogol yn llai aml. Byddai'r ffermydd hyn yn cael archwiliad o leiaf unwaith bob 10 mlynedd, yn hytrach nag unwaith bob 19 - 24 mis fel ar hyn o bryd.**
- **Byddai ffermydd llaeth a ddsbarthwyd i Gategori 3 yn eu harchwiliad diwethaf gan AHDH ac sydd â statws ADF yn cael archwiliad swyddogol o leiaf unwaith bob 5 mlynedd yn y dyfodol yn hytrach nag unwaith bob 13 - 18 mis fel ar hyn o bryd.**
- **Er mwyn gallu rhoi'r newidiadau uchod ar waith, bydd angen darparu rhai mesurau penodol yn gyntaf, i sicrhau cydweithredu da rhwng yr Asiantaeth Safonau Bwyd, AHDH ac ADF.**
- **Ystyriwyd a ellid newid amllder archwiliadau ar gyfer ffermydd yn y categorïau risg uwch (Categoriâu 1 a 2). Nid oedd tystiolaeth o ddadansoddiad yr Asiantaeth Safonau Bwyd yn cefnogi ymagwedd debyg ar gyfer ffermydd risg uwch AHDH ar hyn o bryd. Fodd bynnag, bydd dadansoddiad ac adolygiad arall o'r potensial i ymestyn y newidiadau hyn i ffermydd Categori 2 yn cael eu gwneud ar ôl i'r gweithdrefnau newydd fod ar waith am 12 mis.**

Gwybodaeth gefndirol

Y Cynllun Ffermydd Llaeth Gwarantedig

4. Cynllun gwarantu diwydiant yw Ffermydd Llaeth Gwarantedig (ADF) sy'n nodi a monitro safonau ar gyfer ffermydd llaeth. Mae'n cynrychioli 95% o gynhyrchiant llaeth Cymru, Lloegr a'r Alban ac mae'n rhan o Safonau Sicrwydd Bwyd, y corff mantell ar gyfer cynlluniau gwarantu ffermydd yn y Deyrnas Unedig, sydd hefyd yn rheoli logo'r Tractor Coch. Mae'n rhaid i aelodau gyrraedd safonau a osodir gan y cynllun ac mae cydymffurfiaeth yn cael ei gwirio gan archwiliadau rheolaidd ar y fferm. Mae'r archwiliadau hyn yn cael eu cynnal ar ran ADF gan Gyrrff Ardystio

¹ Mae Rheoliadau (EC) 852/2004 a 853./2004 ar hylendid bwydydd yn nodi'r gofynion o ran hylendid bwyd y mae'n rhaid i fusnesau bwyd (gan gynnwys cynhyrchu cynradd) gydymffurfio â hwy ac mae 854/2004 yn nodi'r gofynion ar gyfer trefnu rheolaethau swyddogol ar gynhyrchion sy'n dod o anifeiliaid.

² Rheoliad (EC) Rhif 882/2004 ar fwyd anifeiliaid a bwyd swyddogol –Croniciad 13..

cymeradwy sy'n annibynnol ar ADF ac aelodau'r cynllun. Mae ADF hefyd yn gwneud ymweliadau ar y fferm ar hap, yn annibynnol ar y Cyrff Ardystio, i ddarparu gwiriad ychwanegol ar y ffordd mae'r safonau'n cael eu cynnal.

5. O dan y cynllun gwneir ymweliadau archwilio o leiaf bob 17 mis (sy'n sicrhau bod ffermydd yn cael eu hasesu ar wahanol adegau o'r flwyddyn). Fodd bynnag, ymwelir â ffermydd y canfyddir bod ganddynt risg uwch yn amlach, fel arfer bob 6-8 mis. Mae'r asesiad yn cynnwys materion megis strwythur a glanweithdra'r parlwr godro a'r cyfleusterau storio llaeth, trefnau godro a glanweithdra'r gwartheg ac ati. Rhoddir gwybod i'r ffermwr ar ddiwedd yr ymweliad am unrhyw achosion o beidio â chydymffurfio â safonau'r cynllun. Bydd unrhyw achosion o beidio â chydymffurfio a ystyrir yn gritigol yn arwain ar unwaith at atal, dros dro, statws gwarantedig y fferm (ac felly'r gallu i werthu unrhyw laeth) ac ni châi'r atal dros dro ei ddiddymu ond ar ôl camau unioni boddhaol. Rhaid i achosion eraill o beidio â chydymffurfio, na ystyrir eu bod yn gritigol, gael eu hunioni cyn pen 60 diwrnod i'r fferm gadw ei statws gwarantedig, er bod y cyfnod hwn yn cael ei leihau i 28 diwrnod o Ebrill 2010 ymlaen.

Asesiadau i gymharu rheolaethau swyddogol a chynllun ADF

6. Wrth wneud ei asesiad, fel cam cyntaf comisiynodd yr Asiantaeth Safonau Bwyd werthusiad a chymhariaeth annibynnol gan Brifysgol Reading i asesu a chymharu dulliau archwiliadau AHDH ac archwiliadau ADF o ran monitro a gwirio cydymffurfiaeth â'r ddeddfwriaeth hylendid bwyd ar ddaliadau cynhyrchu llaeth. Nododd yr adroddiad terfynol nifer o wahaniaethau: mae archwiliadau AHDH yn fwy ymarferol ond mae archwiliadau ADF yn ehangach; mae AHDH yn rhoi cyngor i ffermwyr ond nid yw ADF yn gwneud hynny; cynhelir archwiliadau AHDH at ei gilydd yn llai aml ond maent wedi'u seilio ar risg, lle cynhelir archwiliadau ADF fel rhan o drefn oni fo tystiolaeth o beidio â chydymffurfio; ni roddir rhybudd am ymweliadau AHDH ac maent yn cynnwys amser godro; mae peidio â chydymffurfio yn arwain at erlyn gan AHDH, lle gall ADF atal casglu llaeth.

7. Wedyn sefydlwyd gweithgor bach i asesu'r dichonoldeb a'r graddau y gellid ystyried canlyniadau archwiliadau gwarantu ffermydd wrth benderfynu ar amlder rheolaethau swyddogol. Gwnaethpwyd dadansoddiad ystadegol ar ddata AHDH ac ADF o'r 4 blynedd diwethaf gyda'r nod o asesu'r nodweddion sy'n debyg ac yn wahanol rhwng canlyniad archwiliadau ADF ac AHDH.

Canlyniad y dadansoddiad ystadegol

8. Daeth y gweithgor i'r casgliad bod y dystiolaeth o'r dadansoddiad hwn yn darparu achos da i AHDH ystyried canlyniad archwiliadau ADF wrth asesu'r amserlen briodol ar gyfer archwilio ffermydd â risg is. Fodd bynnag, nid oedd yn cefnogi ymagwedd debyg ar gyfer ffermydd risg uwch AHDH, lle nad oedd asesiadau ADF yn ddangosydd da o gydymffurfiaeth yn y dyfodol. Gellir gweld mwy o fanylion canfyddiadau'r dadansoddiad ystadegol ynghlwm wrth yr Asesiad Effaith.

9. Ar sail y dystiolaeth hon, mae cynigion wedi cael eu datblygu er mwyn ymgynghori â'r cyhoedd ar yr egwyddor y dylid cynnal archwiliadau swyddogol yn llai aml ar ffermydd sydd yn y categorïau risg is ac sydd hefyd yn aelodau o'r cynllun ADF.

Sut y gellid cynnal archwiliadau swyddogol yn llai aml

10. Mae Gweithdrefnau Gweithredu AHDH yn nodi system sgorio i ffermydd ac yn ei gwneud yn ofynnol i'r archwilwyr bennu categori risg, wedi'i seilio ar y sgôr, i bob fferm. 1, 2, 3 a 4 yw'r categorïau risg (categori 1 yw'r risg uchaf a chategori 4 yw'r risg isaf). Y categorïau hyn sydd hefyd yn penderfynu'r amserlen archwilio i'r fferm. Mae safleoedd sy'n gwerthu llaeth yfed heb ei basteureiddio yn cael eu rhoi yng Nghategori 1 yn awtomatig oherwydd y risg uwch i iechyd y cyhoedd sy'n gysylltiedig â'r cynnyrch hwnnw.

Ffermydd Categori 4

11. Cynigir, i ffermydd a ddsbarthwyd i Gategori 4 (risg isaf) yn eu harchwiliad diwethaf gan AHDH ac sydd â statws ADF, y dylid ystyried canlyniadau archwiliad ADF yn y dyfodol er mwyn penderfynu ar amserlenni archwilio yn y dyfodol. I'r ffermydd hyn byddai archwiliadau'n cael eu cynnal o leiaf unwaith bob 10 mlynedd, yn hytrach nag unwaith bob 19 - 24 mis fel ar hyn o bryd.

12. Hefyd, byddai'r ffermydd yng Nghategori 4 a gâi eu dewis i gael eu harchwilio gan AHDH mewn unrhyw flwyddyn yn cael eu dethol ar sail risg. Bydd ffermydd lle mae ADF wedi canfod achosion perthnasol o beidio â chydymffurfio yn yr archwiliad diweddaraf yn cael eu blaenoriaethu ar gyfer eu harchwilio er mwyn galluogi AHDH i asesu a ddylai'r fath ffermydd aros yng Nghategori 4. O'r ffermydd eraill byddai hyd at 10% yn cael eu dethol i'w harchwilio.

Ffermydd Categori 3

13. Cynigir hefyd y byddai ffermydd a ddsbarthwyd i Gategori 3 yn eu harchwiliad diwethaf gan AHDH ac sydd â statws ADF yn cael eu harchwilio o leiaf unwaith bob 5 mlynedd yn y dyfodol yn hytrach nag unwaith bob 13 - 18 mis fel ar hyn o bryd.

14. Byddai'r ffermydd yng Nghategori 3 a gâi eu dewis i gael eu harchwilio gan AHDH mewn unrhyw flwyddyn yn cael eu dethol ar sail risg. Bydd ffermydd lle mae ADF wedi canfod 4 neu fwy o achosion perthnasol o beidio â chydymffurfio yn yr archwiliad diweddaraf yn cael eu blaenoriaethu ar gyfer eu harchwilio er mwyn galluogi AHDH i asesu a ddylai'r fath ffermydd aros yng Nghategori 3. O'r ffermydd eraill byddai hyd at 20% yn cael eu dethol i'w harchwilio.

Ffermydd Categoriâu 1 a 2

15. Ni fyddai'r amserlenni archwilio i'r ffermydd hyn sydd â risg uwch yn newid. Mae'r Asiantaeth Safonau Bwyd yn bwriadu adolygu ar ôl 12 mis a fydd yn briodol ymestyn cydnabyddiaeth o statws ADF yn amllder archwiliadau i ffermydd categori 2 unwaith y bydd yna dystiolaeth nad yw hyn yn creu risg rheoleiddio. Gwneir hyn yng ngoleuni mwy o waith dadansoddi.

Ffermydd sy'n cynhyrchu llaeth o ddefaid, geifr neu fyfflos

16. Ni fyddai unrhyw effaith ar archwiliadau a gynhelir ar ffermydd sy'n cynhyrchu llaeth o ddefaid, geifr neu fyfflos gan nad ydynt yn dod o dan y Cynllun ADF.

Mesurau ychwanegol y mae eu hangen

17. Er mwyn rhoi'r trefniadau newydd hyn ar waith yn effeithiol, bydd angen mesurau i sicrhau cydweithredu da rhwng yr Asiantaeth Safonau Bwyd, AHDH ac ADF. Bydd y rhain yn cynnwys-

- Newidiadau i gwmpas archwiliadau ADF i sicrhau eu bod yn ymdrin yn briodol â materion hylendid – e.e. mwy o archwilio cyfarpar gan archwilwyr ADF.
- Cytundeb ysgrifenedig rhwng yr Asiantaeth Safonau Bwyd ac ADF yn nodi sut y bydd y ddau sefydliad, a hefyd AHDH, yn cydweithio ac yn rhannu gwybodaeth. Bydd hefyd angen i'r cytundeb nodi'r achosion hynny o beidio â chydymffurfio a fydd yn cael eu hystyried yn berthnasol o ran gwneud archwiliad blaenoriaethol gan AHDH yn ofynnol.
- Cynrychiolwyr yr Asiantaeth Safonau Bwyd/AHDH ar Fwrdd a/neu Bwyllgor Ymgynghorol Technegol ADF i alluogi cyfnewid gwybodaeth am y ffordd y cynhelir archwiliadau, gwella ymwybyddiaeth o le mae safonau'n rhagori ar ofynion ddeddfwriaeth a datrys anghydfodau lle mae yna faterion yn ymwneud â dehongli'r gofynion deddfwriaethol.

Bydd yr Asiantaeth Safonau Bwyd, AHDH ac ADF yn datblygu'r trefniadau hyn fel eu bod yn barod cyn i'r trefniadau newydd gael eu cyflwyno.

Adolygu'r trefniadau

18. Unwaith y bydd y system newydd wedi ei sefydlu, byddai dadansoddiad yn cael ei wneud bob blwyddyn er mwyn monitro pa ganran o ffermydd sy'n cael eu rhoi mewn categorïau risg isel gan AHDH ac sy'n parhau i fod â llai na 3 achos o beidio â chydymffurfio yn archwiliad ADF.

19. Hefyd, byddai adolygiad yn cael ei wneud flwyddyn ar ôl rhoi'r trefniadau ar waith pan gaiff dadansoddiad o ffermydd categori 2 ei wneud. Byddai'r adolygiad yn chwilio am dystiolaeth o gydberthyniad mwy rhwng categorïau risg AHDH ac asesiadau ADF er mwyn ystyried a ellid cynnal archwiliadau swyddogol ar ffermydd categori 2 yn llai aml.

20. Gwneir gwerthusiad llawn unwaith y bydd y polisi wedi'i sefydlu am 5 mlynedd o leiaf.

Y Broses Ymgynghori

21. Sefydlodd yr Asiantaeth Safonau Bwyd grŵp rhanddeiliaid gyda chynrychiolwyr o'r diwydiant i fwrw ymlaen â'r gwaith hwn. Cyfarfu bedair gwaith: ym mis Mawrth 2007, mis Gorffennaf 2008, mis Medi 2008 a mis Gorffennaf 2009. Yn y cyfarfod olaf ym mis Gorffennaf 2009 trafododd a chytunodd ar y dewisiadau y byddid yn ymgynghori â'r cyhoedd arnynt.

Y cwestiynau a ofynnir yn yr ymgynghoriad hwn:

- C1: Gofynnir i randdeiliaid gyflwyno sylwadau ar y cynigion i gynnal archwiliadau swyddogol ar ffermydd llaeth â risg is yn llai aml, fel y nodir uchod.
- C2: Gofynnir i randdeiliaid gyflwyno sylwadau hefyd ar y costau a'r buddion (ariannol a heb fod yn ariannol) a nodir yn yr Asesiad Effaith drafft ar gyfer Dewisiadau 1, 2 a 3.

- Rydym yn croesawu sylwadau gan yr holl randdeiliaid. Anfonwch eich ymateb drwy e-bost neu drwy'r post gan ddefnyddio'r manylion cyswllt a roddir. Bydd yr holl ymatebion a ddaw i law fel rhan o'r ymgynghoriad hwn yn cael eu hystyried yn ofalus. Cânt eu crynhoi a'u cyhoeddi ar wefan yr Asiantaeth maes o law.

Ymatebion

Mae'n ofynnol i ymatebion gyrraedd erbyn diwedd y diwrnod gwaith ar 9 Mehefin 2010. Os gwelwch yn dda, yn eich ymateb dywedwch a ydych yn ymateb fel unigolyn preifat neu ar ran sefydliad neu gwmni (gan gynnwys manylion unrhyw randdeiliaid mae'ch sefydliad yn eu cynrychioli).

Diolch i chi ar ran yr Asiantaeth Safonau Bwyd am gymryd rhan yn yr ymgynghoriad cyhoeddus hwn.

Yn gywir,



Mike Pender
Food Standards Agency Wales

Yn amgaaedig

Atodiad A: Gwybodaeth Safonol am yr Ymgynghoriad
Atodiad B: Asesiad Effaith
Atodiad C: Rhestr o bawb sydd â diddordeb

GWYBODAETH SAFONOL AM YR YMGYNGHORIAD

Ymholiadau

1. Os oes gennych unrhyw ymholiadau ynghylch yr ymgynghoriad hwn, cysylltwch â'r sawl a enwir ar dudalen 1 a fydd yn gallu ateb eich cwestiynau.

Cyhoeddi Data Personol a Chyfrinachedd Ymatebion

2. Yn unol ag egwyddor yr Asiantaeth Safonau Bwyd o fod yn agored bydd ein Canolfan Wybodaeth yn Aviation House yn cadw copi o'r ymgynghoriad cyflawn. Bydd modd i'r cyhoedd weld ymatebion drwy wneud cais. Bydd yr Asiantaeth hefyd yn cyhoeddi crynodeb o'r ymatebion, a allai gynnwys data personol, megis eich enw llawn a'ch cyfeiriad ar gyfer cysylltu â chi. Os nad ydych am i ni ryddhau'r wybodaeth hon, a fydddech garediced a llenwi a dychwelyd y ffurflen Cyhoeddi Data Personol, sydd ar gael ar y wefan yn <http://www.food.gov.uk/multimedia/pdfs/dataprotection.pdf> Nid yw dychwelyd y ffurflen hon yn golygu y byddwn yn trin eich ymateb i'r ymgynghoriad yn gyfrinachol, dim ond eich data personol.

3. Yn unol â darpariaethau Deddf Rhyddid Gwybodaeth 2000/Rheoliadau Gwybodaeth Amgylcheddol 2004, gallai pob gwybodaeth a roddir yn eich ymateb gael ei chyhoeddi neu ei datgelu. Os ydych yn credu na ddylid datgelu rhywfaint o'r wybodaeth a roddir yn eich ymateb, dylech nodi'r wybodaeth berthnasol, gwneud cais yn gofyn inni beidio â'i datgelu ac egluro pa niwed yr ydych yn credu y byddai datgelu'r wybodaeth yn ei achosi. Yr Asiantaeth Safonau Bwyd fydd yn penderfynu'n derfynol a ddylid dal yr wybodaeth yn ôl. Fodd bynnag, byddwn yn ystyried eich barn wrth wneud y penderfyniad hwn.

4. Ni fydd unrhyw ymwadiad cyfrinachedd awtomatig a gynhyrchir gan eich system TG yn cael ei ystyried fel cais o'r fath oni bai eich bod yn cynnwys cais penodol, ynghyd ag eglurhad, ym mhrif destun eich ymateb.

Rhagor o Wybodaeth

5. Yn Atodiad D, ceir rhestr o'r cyrff y mae'r llythyr hwn yn cael ei anfon atynt gan fod ganddynt ddi-ddordeb yn y pwnc. Mae croeso i chi anfon y ddogfen hon ymlaen at unrhyw gyrff eraill sydd â diddordeb, neu anfon manylion llawn y cyrff atom a byddwn ninnau'n trefnu i anfon copi yn uniongyrchol atynt hwy.

6. Mae copi Saesneg o'r pecyn ymgynghori ar gael yn www.food.gov.uk

7. Cysylltwch â ni os hoffech gael copïau o'r dogfennau ymgynghori mewn Braille, mewn iaith arall neu ar dâp sain.

8. Rhowch wybod i ni os oes arnoch angen copïau papur o'r dogfennau ymgynghori neu o rywbeth arall sydd wedi'i nodi dan **Dogfennau Perthnasol Eraill**.

11. I gael manylion y drefn ymgynghori (nid ymholiadau ynghylch cynnwys yr ymgynghoriad hwn), cysylltwch â: Cydlynnydd Ymgynghori'r Asiantaeth Safonau Bwyd, Room 1B Aviation House, 125 Kingsway, Llundain, WC2B 6NH, rhif ffôn 020 7276 8630.

Sylwadau ar y Broses Ymgynghori ei hun

12. Hoffem glywed beth oedd eich barn am yr ymgynghoriad hwn ac felly byddem yn croesawu adborth cyffredinol gennych ynglŷn â'r pecyn ymgynghori a'r broses ymgynghori yn gyffredinol. Os hoffech ein helpu i wella ansawdd ymgynghoriadau yn y dyfodol, mae croeso i chi rannu'ch barn gyda ni drwy ddefnyddio'r Holiadur Adborth ynglŷn ag Ymgynghoriad yn <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>

13. Os hoffech glywed am ymgynghoriadau'r Asiantaeth Safonau Bwyd ar bynciau eraill yn y dyfodol, rhowch wybod i ni ym mha feysydd y byddai gennych ddiddordeb penodol drwy ddefnyddio'r Holiadur Adborth yn <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>
Gallwch hefyd ddefnyddio'r holiadur i roi gwybod i ni am unrhyw newid yn eich manylion cyswllt.

Summary: Intervention & Options

Department /Agency: Food Standards Agency	Title: Impact Assessment of recognition of Assured Farm Status in setting inspection frequency for dairy farms.	
Stage: Consultation	Version: 1	Date: February 2010
Related Publications:		

Available to view or download at:

<http://www.>

Contact for enquiries: Karen Pratt

Telephone: 020 7276 8970

What is the problem under consideration? Why is government intervention necessary?

Food can pose a risk to human health if it is not produced, manufactured and handled hygienically. Consumers are not usually able to observe this, and it is difficult for food business operators credibly to inform consumers how far food safety risks have been minimised. Government intervention is necessary to address this information asymmetry. Milk production holdings are required to have official on-farm inspections ‘carried out without prior warning’ to ensure compliance with hygiene regulations. At the same time, the Government is committed to reducing burdens on farmers and improve value for public money wherever possible. An assessment has therefore been carried out on the potential for taking into account the audit results of farms with Assured Dairy Farm status in deciding the necessary frequency of those official inspections.

What are the policy objectives and the intended effects?

The policy objective is to take account of the audit results of farms that have Assured Dairy Farm (ADF) status and hence reduce the burden of inspection, while at the same time maintaining consumer safety. The intended effects are to reduce the costs of inspection on farms that have Assured Dairy Farm status without compromising consumer safety.

What policy options have been considered? Please justify any preferred option.

Option 1 - Do nothing - maintain full reliance on official inspections.
 Option 2 – Reduce official inspection frequency for lower risk (categories 3 & 4) farms that have Assured Dairy Farm (ADF) status.
 Option 3 – Option 2 plus extending the reduction of inspection frequency to intermediate risk farms (category 2) that have (ADF)status
 Option 2 - is the preferred option as evidence from the statistical analysis provides a good case for the outcome of ADF audits to be taken into account when deciding the relevant inspection interval for lower risk farms. Further analysis in the future may provide evidence on whether the policy could be extended to include Category 2 farms that have Assured Dairy Farms status as per Option 3.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? A review will occur after 12 months when an analysis of the risk categorisation of category 2 farms will be undertaken. A full evaluation will be undertaken once the full policy has been established for 5 years.

Ministerial/CEO Sign-off For Consultation Stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the Food Standards Agency Chair*:

.....Date:

* for non-legislative Impact Assessments undertaken by non-ministerial departments/agencies

Summary: Analysis & Evidence

Policy Option: 2

Description: Reduce inspection frequency for lower risk farms which have Assured Dairy Farm status.

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' <ul style="list-style-type: none"> Familiarisation costs to farms of reading and understanding the new procedures (26k); and cost to AHDH of amending each farm record (£4k). 	
	One-off (Transition)	Yrs		
	£ 30,000			
	Average Annual Cost (excluding one-off)			
	£		Total Cost (PV)	£ 30,000
Other key non-monetised costs by 'main affected groups' Costs of implementing IT systems at AHDH, increased ADF inspection time, training costs and the costs to the ADF of making their data available to AHDH.				

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' <ul style="list-style-type: none"> AHDH reduced frequency of inspections of lower risk farms (£319k) a year; and reduced costs for lower risk farmers as they will not have to accompany inspectors as often around their farms 	
	One-off	Yrs		
	£			
	Average Annual Benefit (excluding one-off)			
	£ 356,000		Total Benefit (PV)	£ 3.06 m
Other key non-monetised benefits by 'main affected groups'				

Key Assumptions/Sensitivities/Risks As is outlined in the main section, the calculations involve a number of assumptions including the number of non-conformance inspections which is subject to change depending on actual outturns.

Price Base Year 2009	Time Period Years 10	Net Benefit Range (NPV) £ 3.03 m	NET BENEFIT (NPV Best estimate) £ 3.03 m
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What is the geographic coverage of the policy/option?		England and Wales		
On what date will the policy be implemented?		[2010]		
Which organisation(s) will enforce the policy?		FSA, AHDH, ADF		
What is the total annual cost of enforcement for these organisations?		£ N/A		
Does enforcement comply with Hampton principles?		Yes		
Will implementation go beyond minimum EU requirements?		No		
What is the value of the proposed offsetting measure per year?		£ 0		
What is the value of changes in greenhouse gas emissions?		£ 0		
Will the proposal have a significant impact on competition?		No		
Annual cost (£-£) per organisation (excluding one-off) England and Wales figures	Micro 0	Small 0	Medium 0	Large 0
Are any of these organisations exempt?	No	No	N/A	N/A

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

1. Reason for Intervention

1.1 Food can pose a risk to human health if it is not produced, manufactured and handled hygienically. Consumers are not usually able to observe this, and it is difficult for food business operators credibly to inform consumers how far food safety risks have been minimised. Government intervention is necessary to address this information asymmetry.

1.2 Official on-farm inspections for milk production holdings are designed to address this information asymmetry by inspecting all farms to ensure compliance with hygiene regulations.

1.3 However, there is scope to reduce the burden of inspections by recognising relevant industry, quality assurance programmes to help prioritise and reduce the frequency of official inspections. An independent study and a pilot project have therefore been carried out in order to help assess the potential for recognising Assured Dairy Farm status.

2. Intended effect

2.1 The policy objective is to take account of the audit results (hygiene aspects only) of farms that have Assured Dairy Farm status in order to reduce the burden of official inspection, while at the same time maintaining consumer safety. The intended effect is to reduce the costs of inspection on farms that have Assured Dairy Farm status by reducing the frequency of official inspections but without compromising consumer safety.

2.2 It is expected that the policy would also provide incentives for farms to move towards lower risk categories through an improvement in their hygiene performance. Under the proposed policy, lower risk farms benefit by having a longer time interval between inspections than their higher risk counterparts.

3. Background

3.1 EC Regulations 852/2004 and 853/2004 on the hygiene of foodstuffs set out food hygiene requirements with which food businesses (including primary production) must comply. In addition, 854/2004 sets out the requirements for the organisation of official controls on products of animal origin. EC Regulation 882/2004 on official feed and food controls requires that official controls are carried out without prior warning. Under these arrangements, in England and Wales, milk production holdings are subject to official inspections by Animal Health Dairy Hygiene (AHDH) on behalf of the Food Standards Agency (the competent authority) for compliance with food hygiene legislation. The majority of these holdings are also audited for compliance with farm assurance scheme standards by Assured Dairy Farms (ADF), the industry assurance scheme that is part of Assured Food Standards.

3.2 As part of the Government Whole Farm Approach initiative, the On-farm Inspections Project is developing a strategy for integrating on-farm industry and enforcement visits. The purpose of the On-farm Inspections Project is to reduce the burdens on farmers and improve value for public money, whilst maintaining consumer safety. It will achieve this through the following outcomes:

- Rationalise on-farm inspection visits where possible including both the regulatory and voluntary sectors, resulting in more efficient working within the department and associated bodies and a reduced burden on farmers.

- Share inspection data to reduce duplication of inspection effort and to reduce the burden on farmers and to enable regulators to build up a risk profile for individual farm businesses.
- Improve scheduling of necessary visits, including increased cross department/agency co-ordination to reduce the impact of visits on farmers.

3.3 One area which was identified for consideration was inspection activity in the dairy sector.

Regulation (EC) No 882/2004 on official feed and food controls recognises in the recitals (paragraph 13) the use of relevant private quality assurance programmes for the risk categorisation of official controls. The FSA has applied this principle to official controls in relation to Annex 1 of Regulation (EC) No 852/2004 in those primary sectors where food hygiene requirements had not previously applied. There is therefore an interest to assess whether the approach might be extended to the dairy sector where official controls on milk production premises have been established for many years.

3.4 An independent study³ was carried out to assess and compare the approaches of AHDH (official) inspections and ADF (assurance scheme) audits to monitoring and verifying compliance with food hygiene legislation at milk production holdings in England and Wales. A number of aspects were looked at, including: assessor training, inspection focus and approach, risk establishment, reporting of outcomes, addressing contraventions and auditing. It was found that both organisations had similar training requirements. However, a number of differences were found: AHDH inspections are more practical while ADF audits are broader; AHDH provide advice to farmers whereas ADF do not; AHDH inspections are generally less frequent but risk based, whereas ADF audits are routine unless there is evidence of non-conformance; AHDH visits are unannounced and include milking time; non-conformity leads to prosecution by AHDH, whereas ADF can halt milk collection.

3.5 A further project was then carried out to assess the similarities and differences between the outcome of ADF and AHDH inspections in terms of the risk category applied to farms following audit/inspection. The aim of this project was to inform the feasibility and extent to which the results of farm assurance (ADF) audits could be taken into account when deciding the frequency of official controls (AHDH inspections).

3.6 Data on inspections/audits were drawn together from ADF and AHDH⁴ databases, underwent a matching exercise and were analysed. The analysis involved matching individual farm assessments across both schemes and comparing the outcome of the most recent visit from each scheme.

3.7 The main conclusions of the analysis:

- There appears to be a general correlation between the risk assessments of the two schemes (i.e. more farms assessed as low risk by ADF were assessed as low risk

³ Bailey, A., Aikman, P., Deaville, E., Garforth, C., Jukes, D. (2008) A technical assessment and comparison of the inspections carried out by Animal Health Dairy Hygiene and audits undertaken by Assured Dairy Farms. *Final report to the Food Standards Agency*. The School of Agriculture, Policy and Development, University of Reading, June 2008.

⁴ It should be noted that the data used in the analysis was drawn from a period when AHDH categorised farms as high, medium or low risk. During 2008-09, the FSA consulted on revised AHDH Operating Procedures which, amongst other things, included a revised risk rating and scoring system and farms are now categorised at primary inspections (based on their score) as either category 1, 2, 3, or 4 (category 1 being highest risk and category 4 being lowest risk). The general conclusions of the analysis are considered still to apply.

by AHDH than in other ADF categories; more farms assessed as high risk by ADF were assessed as high risk by AHDH than in other ADF categories), although the extent of alignment differs across AHDH risk categories.

- Where holdings are already in the AHDH low risk category, ADF risk assessments appear to be as good an indicator of future compliance as the previous AHDH risk categorisation.
- Where holdings are in the AHDH high risk category, ADF audits were not a good indicator of future compliance.
- Evidence for the use of ADF audits was less clear for the AHDH medium risk category

3.8 Further detail on the analysis can be found in Annex 1. Evidence from the analysis therefore provided a good case for AHDH to take into account the outcome of ADF audits when assessing the appropriate inspection interval for AHDH low risk farms. However, the analysis did not support a similar approach for AHDH high risk farms, where ADF assessments were not a good indicator of future compliance.

Proposal to reduce frequency of AHDH inspections

Diagram 1 illustrates how farms are inspected under the current system.

Diagram 1

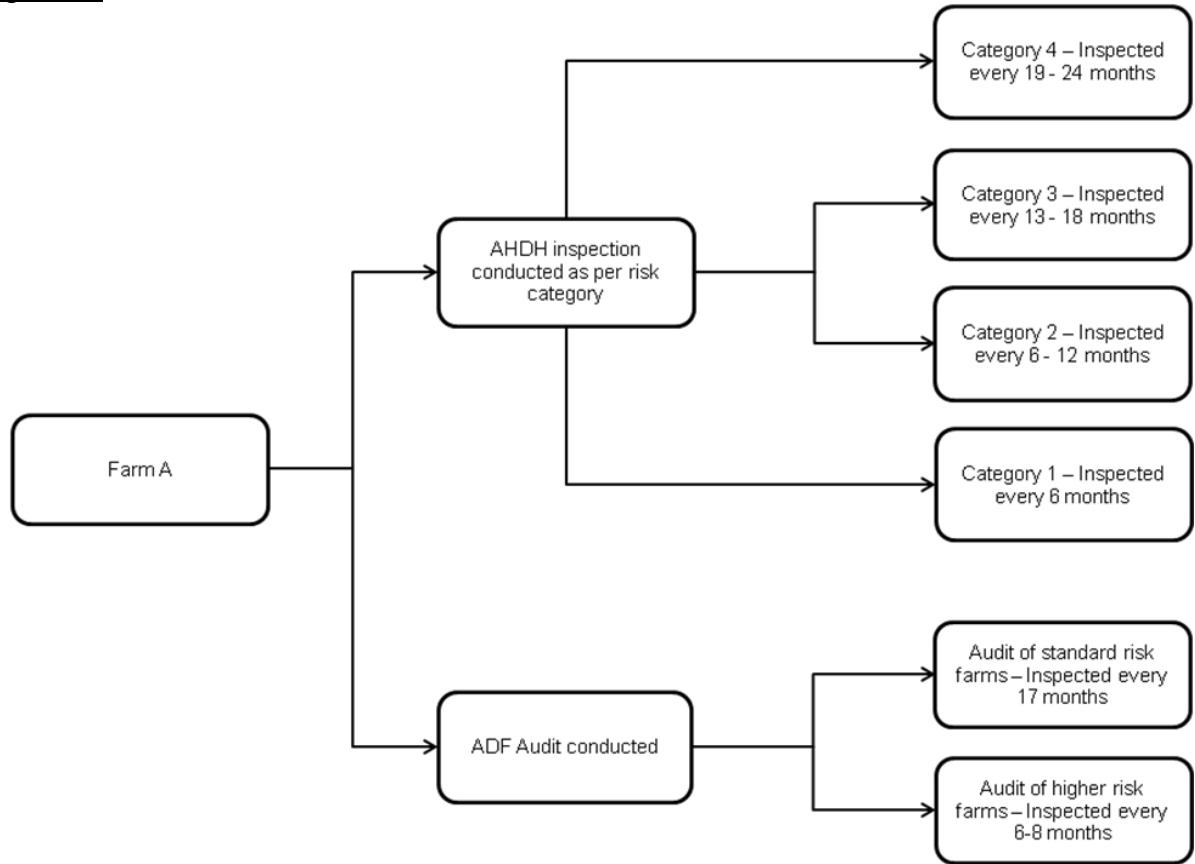
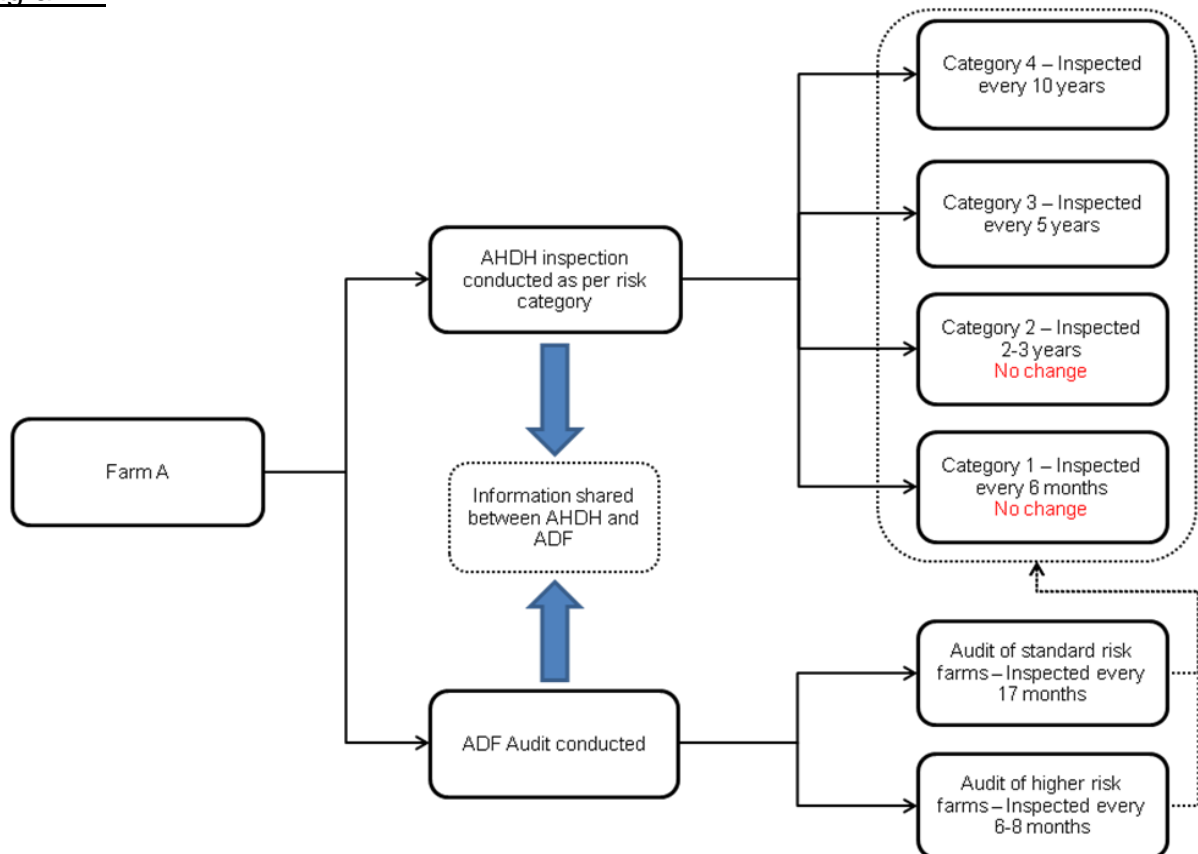


Diagram 2 illustrates how farms will be inspected under option 2.

Diagram 2



3.10 Tables 1 and 2, below, present the effects of options 2 and 3 respectively on all farm categories and how the inspection frequency will change. Equivalent figures for *Option 1: Do nothing and maintain full reliance on official controls* appear in column 2 of the tables.

Option 2

3.11 Reduce official inspection frequency for lower risk farms (categories 3 and 4) that have Assured Dairy Farm status. If ADF find relevant non-conformances beyond those which are permitted under the risk category, then those farms will be prioritised for AHDH inspections. We have estimated the number of non-conformances as outlined in the table below.

Table 1

Category of Dairy Farm	Current frequency of Official Monitoring inspections (Option 1)	Proposed frequency of Official Monitoring inspections	Prioritised Inspections if ADF find non-conformances
Category 4	Every 19 – 24 months	At least every 10 years	Farms that are identified with relevant non-conformances by the ADF will be prioritised for inspection by the AHDH to determine whether they can remain category 4 farms. Evidence suggests that 15% of ADF inspections receive a relevant non-conformance (around 11% of Category 4 farms).
Category 3	Every 13 – 18 months	At least every 5 years	Farms where ADF have identified 4 ⁵ or more relevant non-conformances at the most recent audit will be prioritised for inspection to enable AHDH to assess whether such farms should remain as Category 3. Evidence suggests that 10% of ADF inspections will have 4 or more relevant non-conformances (around 7% of Category 3 farms).

⁵ This is subject to change

Option 3

3.12 Option 2 plus extending the reduction of inspection frequency to include intermediate risk farms (category 2) that have Assured Dairy Farm status. Note, this option would be dependent upon further analysis showing a stronger correlation between AHDH and ADF risk categories (see below).

Table 2

Category of Dairy Farm	Current frequency of Official Monitoring inspections Option 1	Proposed frequency of Official Monitoring inspections	Prioritised Inspections if ADF find-non conformances
Category 2	Every 6 – 12 months	At least every 2 – 3 years	Farms where ADF have identified 4 ⁶ or more relevant non-conformances at the most recent audit will be prioritised for inspection to enable AHDH to assess whether such farms should remain as Category 3. It has been assumed for this purpose that 10% ADF inspections of category 2 farms will have 4 or more relevant non-conformances (around 7% of Category 2 farms).

3.13 Option 3 is dependent on the outcome of future statistical analysis and will only be pursued if the analysis provides the necessary evidence that a reduction in inspections to intermediate risk farms (category 2) will not have an adverse effect on consumer safety. It is therefore included for completeness.

Farms not certified by ADF

3.14 The above arrangements would only apply to dairy farms supplying cows' milk to milk purchasers who are members of ADF, which represents around 95% of all cows' milk producers. The arrangements in relation to inspections carried out at dairy farms processing their own cows' milk who are not members of ADF or farms supplying cows' milk to purchasers who are not members of ADF, would not be affected. Likewise arrangements in relation to inspections carried out at farms producing sheep, goats' or buffaloes' milk would not be affected as these are not currently part of the ADF Scheme.

4. Options

Option 1 - Do nothing - maintain full reliance on official inspections.

Option 2 - Reduce official inspection frequency for lower risk farms (categories 3 and 4) that have Assured Dairy Farm status.

Option 3 - Option 2 plus extending the reduction of inspection frequency to intermediate risk farms (category 2) that have Assured Dairy Farm status (dependent on the outcome of future statistical analysis).

⁶ This figure is subject to change depending on the statistical evidence when a review is carried out

4.1 Option 2 is the preferred option as evidence from the statistical analysis provides a good case for AHDH to take into account the outcome of ADF audits when assessing the appropriate inspection interval for **lower** risk farms. There may be scope to extend the approach to category 2 farms as per Option 3 however, this is dependent on further statistical analysis (see above and implementation and review section).

4.2 There is currently no evidence to support a similar approach for all ADF farms, some of which will be AHDH **high** risk farms, due to an increase in consumer safety risk and application of the precautionary principle.⁷

4.3 Table 3, below, summarises the number of dairy farms affected and their current risk category status (see table 1 and 2 above)⁸. It is assumed that 95% of milk production is by members of ADF. The table below shows the number of farms in each category.

Table 3 – Number of farms per category

Category	Number of farms
4	261
3	4,240
2	4,458
1	1,914
Total Farms Affected	10,873

Benefits: Methodology for Estimating Benefits

4.4 The main benefit of the proposal is the longer time period between AHDH inspections, without any compromises to consumer protection. In order to estimate the benefits, it is necessary to calculate the difference between the current frequency of inspections and the new frequency of inspections under the proposals, and the subsequent change in the number of inspections in any given year.

4.5 As is shown in diagram 1, under current procedures a farm in Category 4 can currently expect an inspection every 19 to 24 months. Accordingly, the intermediate value of 22 months between inspections has been used to calculate the number of inspections in a given year⁹. The same process is also used for the other risk categories relevant to this proposal, which presents the current number of inspections.

4.6 Under the proposal, farms in each category are subject to a cyclical official monitoring inspection which is dependent on the current risk categorisation of the farm, as shown in table 2. For example, a category 4 farm will be inspected at least once over a ten year period compared to currently an inspection occurring between every 19 and 24 months. When ADF carry out their regular audits and find relevant non-conformances¹⁰ beyond those which are permitted under the relevant risk category (see table 1 and 2), then those farms will be prioritised for an official monitoring inspection by AHDH. The number of permitted non-conformances varies according to the category of the farm e.g. a

⁷ HM Treasury, Green Book

⁸ Source: ADF

⁹ An average has been used and is achieved by summing 19 and 24 months divided by 2, which equals 21.5 which has been rounded to 22

¹⁰ Relevant non conformance – relevant hygiene non-conformances are to be agreed between FSA/AHDH and ADF.

category 4 farm will be prioritised for inspection by AHDH, if **one** or more relevant non-conformance is found during the ADF audit. Table 4 includes information of the assumed number of relevant non conformances that will trigger an additional inspection, plus the estimated % of non-conformances used in the analysis.

Therefore, under the proposed system:

The number of inspections in a year = total of the number of farms which are prioritised for an inspection due to the existence of non conformances + remaining number of farms who have their cyclical official monitoring inspection

Estimating the number of non-conformances

4.7 As outlined above, in order to estimate the total number of inspections under the proposed system, it is necessary to estimate the number of AHDH inspections carried out as a result of exceeding the permitted number of non-conformances in the ADF audit. As the proposed system is currently not in operation, this has been estimated from a combination of results of statistical analysis and internal judgement/opinion, and is subject to change. Table 4 below shows the estimates for farms receiving an ADH inspection, exceeding the permitted number of non-conformances.

Table 4 – Estimated percentage of farms of relevant non conformances per category

Farm Category	Estimated % of ADH inspections exceeding relevant non-conformances ¹¹	Source
Category 4	15% (or 11% of total category 4 farms)	The data suggested that ADF found one or more non conformances at 49% of Category 4 farms. However, a lower estimate has been used as review of a sample of audit reports suggested that not all of these non conformances would be relevant to AHDH
Category 3	10% (or 7% of total category 3 farms)	The data suggests that ADF found 4 or more non conformances at 8% of Category 3 inspections, and this has been rounded to 10%.
Category 2	10% ¹² (or 7% of total category 2 farms)	This is an estimate
Category 1		Outside the scope of this proposal

5. Costs and benefits of options

Option 1 Do nothing – maintain full reliance on current inspections

There are no incremental costs and benefits of the do nothing option.

Option 2 – Reduce official inspection frequency for lower risk farms (categories 3 and 4) that have Assured Dairy Farm status

¹¹ ADF audit farms at least every 17 months so the number of farms receiving relevant non conformances has been annualised on the basis of a 17 month interval between audits.

¹² This is subject to change

Category 4 Benefits

5.1 Under the current system, category 4 farms are visited every 19 – 24 months which means that on average¹³ there are currently 148 AHDH inspections per year to category 4 farms.

5.2 Under the proposed system, category 4 farms will be prioritised for their official monitoring inspection by AHDH when ADF find relevant non-conformances which exceed the permitted number of non conformances. We have estimated that 15% of category 4 farms inspected by ADF will receive one or more relevant non-conformance and will be prioritised for inspection by AHDH, which equates to 28 farms to be visited per year¹⁴. The remaining farms have a cyclical official monitoring inspection at least every 10 years which equates to 23 inspections per year¹⁵. Under the new system there will be a total of 51 inspections per year to category 4 farms, compared with 148 currently, resulting in a 65% reduction in the number of inspections to category 4 farms per year.¹⁶

	Category 4
Current number of inspections	148
Prioritised inspections due to 1 relevant N/C	28
Official Monitoring inspections	23
Proposed number of inspections	51
Reduction in the number of inspections	97
% Reduction	65%

5.3 The benefits of the new proposal will result from cost savings to both the FSA and farmers as a result of fewer official inspections. For each inspection carried out by AHDH the FSA is charged £134¹⁷. As a result of inspections being reduced from 148 to 51 per year the cost to the FSA of AHDH inspections is reduced from £19,784 to £6,829 resulting in a saving to the FSA of £12,955 per year for category 4 farms. The table below details how this has been calculated.

	Category 4
Current number of inspections per year	148
Cost per inspection	£134
Current cost to AHDH	£19,784

¹³ Taking 22 as mid-point month

¹⁴ ADF inspections occur every 17 months, and so the figure is annualised: $((261/17)*12)*15\% = 28$

¹⁵ $(261 - 28)*(0.1) = 23$

¹⁶ This modelling is static and does not consider any dynamic effects such as non-conformances leading to risk re-categorisation, some farms in both non-conformances and official monitoring inspections categories etc.

¹⁷ Animal health Service Agreement 2009/10.

Proposed number of inspections per year	51
Cost per inspection	£134
Estimated cost to AHDH	£6,829
Reduction in inspections per year	97
Cost per inspection	£134
Saving per year	£12,955
Rounded	£13,000

5.4 The reduction in the number of inspections will manifest into savings for farmers as a result of them escorting inspectors around their facilities less frequently. To calculate the cost saving to a farmer, a cost per inspection for a farmer has been estimated as outlined in the table below. All figures are in line with the methodology outlined in the Standard Cost Model, except that 2009 figures have been used for consistency.

Table 7 - Cost per inspection to farmers England and Wales	
Average hours with inspector	1.75
Hourly wage rate	12.02
Overhead inflator	30%
Hourly Rate plus overheads	£15.63
Business as Usual (BAU) Deflator	43%
Wage rate plus overheads less BAU	£8.91
Cost per farm (Hours * Wage)	£15.59

5.5 Under the current system the total cost of escorting inspectors for category 4 farmers is £2,301 while under the proposed system it will cost farmers £1,507 per year, a saving of £1,507 per year. The table below details how the benefits to farmers in category 4 have been calculated.

Table 8 - Summary of Benefits to Farmers England and Wales	
	Category 4
Current number of inspections per year	148
Farmer cost per inspection	£15.59
Current total cost for farmers	£2,301
Proposed number of inspections per year	51
Farmer cost per inspection	£15.59
Estimated cost to farmers	£794
Reduction in inspections per year	97
Farmer cost per inspection	£15.59
Total saving per year	£1,507
Rounded	£2,000

Category 3 Benefits

5.6 Under the current system category 3 farms are visited every 13 – 18 months which means that on average¹⁸ there are currently 3,371 AHDH inspections per year to category 3 farms.

5.7 Under the proposed system, category 3 farms will be prioritised for their official monitoring inspection by AHDH when ADF find relevant non-conformances which exceed the permitted number of non conformances. We have estimated that 10% of category 3 farms inspected by ADF will receive four or more relevant non-conformance and will be prioritised for inspection by AHDH, which equates to 299 category 3 farms to be visited per year¹⁹. The remaining farms have a cyclical official monitoring inspection at least every 5 years which equates to 788 inspections per year²⁰. Under the new system there will be a total of 1,088 inspections per year to category 3 farms meaning a 68% reduction in the number of inspections to category 3 farms per year. The table below shows the effects on the number of inspections to category 3 farms²¹.

Table 9 - Number of inspections in Category 3 England and Wales	
	Category 3
Current number of inspections	3,371
Prioritised inspections due to 3 or more relevant N/C	299
Official Monitoring inspections	788
Proposed number of inspections	1,088
Reduction in the number of inspections	2,283
% Reduction	68%

5.8 As a result of inspections being reduced from 3,371 to 1,088 per year the cost to the FSA of AHDH inspections is reduced from £451,654 to £145,729 a saving to the FSA of £305,925 per year for category 3 farms. The table below details how this has been calculated.

¹⁸ Taking 16 as an average

¹⁹ ADF inspections occur every 17 months, and so the figure is annualised: $((4,240/17)*12)*10\% = 299$

²⁰ $(4,240 - 299)*(0.2) = 788$

²¹ This modelling is static and does not consider any dynamic effects such as non-conformances leading to risk re-categorisation, some farms in both non-conformances and official monitoring inspections categories etc.

Table 10 - Summary of Benefits to FSA England and Wales	
	Category 3
Current number of inspections per year	3,371
Cost per inspection	£134
Current cost to AHDH	£451,654
Proposed number of inspections per year	1,088
Cost per inspection	£134
Estimated cost to AHDH	£145,729
Reduction in inspections per year	2,283
Cost per inspection	£134
Saving per year	£305,925
Rounded	£306,000

5.9 The benefits for farmers are the savings from not escorting inspectors around their farms (see table 7 for the cost per farm). Under the current system the total cost of escorting inspectors for category 3 farmers is £52,537 while under the proposed system it will cost farmers £16,951 per year, a saving of £35,585 per year. The table below details how the benefits to farmers in category 3 have been calculated.

Table 11 - Summary of Benefits to Farmers England and Wales	
	Category 3
Current number of inspections per year	3,371
Farmer cost per inspection	£15.59
Current total cost for farmers	£52,537
Proposed number of inspections per year	1,088
Farmer cost per inspection	£15.59
Estimated cost to farmers	£16,951
Reduction in inspections per year	2,283
Farmer cost per inspection	£15.59
Total saving per year	£35,585
Rounded	£36,000

5.10 The total annual benefits of option 2 are £355,972 which is comprised of £318,880 for FSA and £37,072 for farmers.

Table 12, below, summarises the benefit of option 2 to the FSA

Table 12 - Summary of Benefits to FSA England and Wales			
	Category 4	Category 3	Total
Current number of inspections per year	148	3,371	3,518
Cost per inspection	£134	£134	£134
Current cost to AHDH	£19,784	£451,654	£471,438
Proposed number of inspections per year	51	1,088	1,138
Cost per inspection	£134	£134	£134
Estimated cost to AHDH	£6,829	£145,729	£152,558
Reduction in inspections per year	97	2,283	2,380
Cost per inspection	£134	£134	£134
Saving per year	£12,955	£305,925	£318,880
Rounded	£13,000	£306,000	£319,000

Table 13, below, below summarises the benefit of option 2 to Farmers

Table 13 - Summary of Benefits to Farmers England and Wales			
	Category 4	Category 3	Total
Current number of inspections per year	148	3,371	3,518
Farmer cost per inspection	£15.59	£15.59	£15.59
Current total cost for farmers	£2,301	£52,537	£54,838
Proposed number of inspections per year	51	1,088	1,138
Farmer cost per inspection	£15.59	£15.59	£15.59
Estimated cost to farmers	£794	£16,951	£17,746
Reduction in inspections per year	97	2,283	2,380
Farmer cost per inspection	£15.59	£15.59	£15.59
Total saving per year	£1,507	£35,585	£37,092
Rounded	£2,000	£36,000	£37,000

Costs for category 3 and 4

5.11 We have assumed that farmers will need to read the new procedures and will spend between 15 and 30 minutes to familiarise themselves with the change. The familiarisation cost is quantified by multiplying an hourly wage rate for farm managers of £15.63²² by an average of the reading time of between 15 and 30

²² Wage rate obtained from The Annual Survey of Household Earnings (2009) (<http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>). Median hourly wage of a 'Farm Manager' is used (£15.63 including 30% overheads)

minutes. This equates to a familiarisation cost of £26,377. The table below shows the familiarisation cost for each category.

Table 14 - Summary of Costs per category to farms England and Wales	
<i>Category 4</i>	
Reading time (hours)	0.375
Farm manager hourly rate	£15.63
Cost per farm	£5.86
Number of farms	261
Familiarisation costs	£1,529
<i>Category 3</i>	
Reading time (hours)	0.375
Farm manager hourly rate	£15.63
Cost per farm	£5.86
Number of farms	4,240
Familiarisation costs	£24,848
Total	£26,377
Rounded	£26,000

5.12 We have estimated a cost to AHDH of adapting their procedures to collaborate and utilise the audits carried out by ADF. This consists of 3 minutes to update each farm record on the AHDH database, and there will be 261 category 4 farms and 4,240 category 3 farms whose records need to be updated. We have used an hourly wage for a public service employee of £17²³ per hour. To calculate the cost of updating the systems the wage rate is multiplied by the number of records that need to be modified leading to a one off cost of £3,850 which rounded is £4,000.

Therefore the total one off cost is £30,000 (£26,000 familiarisation cost to farmers plus £4,000 to AHDH of updating records).

Non monetised costs

5.13 There will also be other costs in some cases including increased audit duration, additional equipment inspection and iauditor training. For training it is unclear whether such costs would be absorbed e.g. training incorporated into normal training procedures or whether separate training events would be required.

We invite stakeholders to provide detailed descriptions and a detailed breakdown of any non monetised costs.

²³ Wage rate obtained from The Annual Survey of Household Earnings (2009) (<http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>). Median hourly wage of a 'Public Service And Other Associate Professionals' is used (£17.11 including 30% overheads)

Option 3

Benefits

5.14 This option will extend the reduction of AHDH farm inspections to category 2 farms as well as category 3 and 4 farms, and this will result in the same cost savings as in option 2, plus extra savings resulting from the inclusion of category 2 farms. This option is dependent on the outcome of future statistical analysis and will only be pursued if the analysis provides the necessary evidence to support that a reduction in inspections to intermediate risk farms (category 2) will not have an adverse effect on consumer safety. It is therefore included for completeness.

5.15 Under the current system, category 2 farms are visited every 6 – 12 months which means that on average²⁴ there are currently 6,687 AHDH inspections per year to category 2 farms.

5.16 Under the proposed system, category 2 farms will be prioritised for their official monitoring inspection by AHDH when ADF find relevant non-conformances which exceed the permitted number of non conformances. We have estimated that 10% farms inspected by ADF will receive four or more relevant non-conformance and will be prioritised for inspection by AHDH, which equates to 315 category 2 farms visited per year²⁵. The remaining farms have a cyclical official monitoring inspection at least every 2 to 3 years which equates to 1,719 inspections per year²⁶. Under the new system there will be a total of 2,034 inspections per year to category 2 farms meaning a 70% reduction in the number of inspections to category 2 farms per year. The table below shows the effects on the number of inspections to category 2 farms²⁷.

	Category 2
Current number of inspections	6,687
Prioritised inspections due to 3 or more relevant N/C	315
Official Monitoring inspections	1,719
Proposed reduction in number of inspections	2,034
% Reduction	70%

5.17 As a result of inspections being reduced from 6,687 to 2,034 per year the cost to the FSA of AHDH inspections is reduced from £896,023 to £272,567 a cost saving to the FSA of £623,457 per year for category 2 farms. The table below details how this has been calculated.

²⁴ Taking 9 as an average

²⁵ ADF inspections occur every 17 months, and so the figure is annualised: $((4,458/17)*12)*10\% = 315$

²⁶ $(4,458 - 315)*((0.33+0.5/2)) = 1,719$

²⁷ This modelling is static and does not consider any dynamic effects such as non-conformances leading to risk re-categorisation, some farms in both non-conformances and official monitoring inspections categories etc.

Table 16 - Summary of Benefits to FSA England and Wales	
	Category 2
Current number of inspections per year	6,687
Cost per inspection	£134
Current cost to AHDH	£896,023
Proposed number of inspections per year	2,034
Cost per inspection	£134
Estimated cost to AHDH	£272,567
Number of reduced inspections per year	4,653
Cost per inspection	£134
Saving per year	£623,457
Rounded	£623,000

5.18 The benefits for farmers are again the savings from not escorting inspectors around their farms (see table 7 for the cost per farm). Under the current system the total cost of escorting inspectors for category 2 farmers is £104,226 while under the proposed system it will cost farmers £31,705 per year, a saving of £72,521 per year. The table below details how the benefits to farmers in category 2 have been calculated.

Table 17 - Summary of Benefits to Farmers England and Wales	
	Category 2
Current number of inspections per year	6,687
Farmer cost per inspection	£15.59
Current total cost for farmers	£104,226
Proposed number of inspections per year	2,034
Farmer cost per inspection	£15.59
Estimated cost to farmers	£31,705
Number of reduced inspections per year	4,653
Farmer cost per inspection	£15.59
Total saving per year	£72,521
Rounded	£73,000

5.19 The total annual benefits of option 3 are £1,051,949 comprising of £942,336 for FSA and £109,613 for farmers.

Table 18, below, summarises the benefit of option 3 to the FSA

Table 18 - Summary of Benefits to FSA England and Wales				
	Category 4	Category 3	Category 2	Total
Current number of inspections per year	148	3,371	6,687	10,205
Cost per inspection	£134	£134	£134	£134
Current cost to AHDH	£19,784	£451,654	£896,023	£1,367,461
Proposed number of inspections per year	51	1,088	2,034	3,173
Cost per inspection	£134	£134	£134	£134
Estimated cost to AHDH	£6,829	£145,729	£272,567	£425,125
Number of reduced inspections per year	97	2,283	4,653	7,032
Cost per inspection	£134	£134	£134	£134
Saving per year	£12,955	£305,925	£623,457	£942,336
Rounded	£13,000	£306,000	£623,000	£942,000

Table 19, below, summarises the benefit of option 3 to Farmers

Table 19 - Summary of Benefits to Farmers England and Wales				
	Category 4	Category 3	Category 2	Total
Current number of inspections per year	148	3,371	6,687	10,205
Farmer cost per inspection	£15.59	£15.59	£15.59	£15.59
Current total cost for farmers	£2,301	£52,537	£104,226	£159,064
Proposed number of inspections per year	51	1,088	2,034	3,173
Farmer cost per inspection	£15.59	£15.59	£15.59	£15.59
Estimated cost to farmers	£794	£16,951	£31,705	£49,451
Number of reduced inspections per year	97	2,283	4,653	7,032
Farmer cost per inspection	£15.59	£15.59	£15.59	£15.59
Total saving per year	£1,507	£35,585	£72,521	£109,613
Rounded	£2,000	£36,000	£73,000	£110,000

Costs

5.20 Familiarisation costs for farmers will include the familiarisation costs from option 2 plus the familiarisation cost for category 2 farms. A wage rate of £15.63²⁸ per hour has been applied to a farm manager and is multiplied by the reading time

²⁸ Wage rate obtained from The Annual Survey of Household Earnings (2009) (<http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>). Median hourly wage of a 'Farm Manager' is used (£15.63 including 30% overheads)

which is between 15 and 30 minutes. This equates to a familiarisation cost of £52,498. The table below shows the familiarisation cost for each category.

Table 20 - Summary of Costs per category to farms England and Wales	
<u>Category 4</u>	
Reading time (hours)	0.375
Farm manager hourly rate	£15.63
Cost per farm	£5.86
Number of farms	261
Familiarisation costs	£1,529
<u>Category 3</u>	
Reading time (hours)	0.375
Farm manager hourly rate	£15.63
Cost per farm	£5.86
Number of farms	4,240
Familiarisation costs	£24,848
<u>Category 2</u>	
Reading time (hours)	0.375
Farm manager hourly rate	£15.63
Cost per farm	£5.86
Number of farms	4,458
Familiarisation cost	£26,122
Total Familiarisation cost	£52,498
Rounded	£52,000

5.21 There will be a cost to AHDH of adapting their systems to collaborate and utilise the audits carried out by ADF. It has been assumed that each farm record on AHDH database will require updating which is expected to take 3 minutes per record. The costs of updating the database for category 4 and 3 farms have been calculated under option 2 and under this option the cost of category 2 farms will be measured. There are 4,458 farms listed as category 2 farms, and it believed that it will take three minutes for a public sector employee at a wage rate of £17.11²⁹ which along with category 4 and 3 farms it is expected to cost a one off £7,664.

5.22 Therefore the total one off cost is £60,000 (£52,000 familiarisation cost to farmers plus £8,000 to AHDH of updating records).

²⁹ Wage rate obtained from The Annual Survey of Household Earnings (2009) (<http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=15313>). Median hourly wage of a 'Public Service And Other Associate Professionals' is used (£17.11 including 30% overheads)

Non monetised costs

5.23 There will also be other costs including increased audit duration, additional equipment inspection and auditor training. It is unclear whether such costs would be absorbed e.g. training incorporated into normal training procedures or whether separate training events would be required.

We invite stakeholders to provide detailed descriptions and a detailed breakdown of any non monetised costs.

We invite stakeholders to comment on the Benefits and Costs Section and comment if they are content with the assumptions made. The figures used are therefore subject to change in the light of comments received.

6. Administrative Burden Costs

6.1 There are no additional administrative burden costs for the preferred option.

7. Consultation

7.1 The FSA set up a stakeholder group with industry representatives to take this work forward. It met four times: in March 2007, July 2008, September 2008 and July 2009. The last meeting in July 2009 discussed and agreed the options that would be put to public consultation

8. Enforcement

8.1 A written agreement will be required between FSA, AHDH and ADF setting out how the organisations will work together and share information.

8.2 FSA/AHDH representation on the ADF Board and/or Technical Advisory Committee would enable exchange of information on conduct of audits/inspections, improve awareness of where standards exceed legislation requirements and resolve differences where there are matters relating to interpretation of the legislative requirements.

8.3 Mechanisms for exchange of information between AHDH and ADF will be important. ADF's new database should be in place by April 2010 and will facilitate improved access to information on the results of audits. There is a need to consider in detail what, how and when information will be passed to AHDH e.g. loss of ADF certification, number of hygiene non-conformances at each audit, any critical non-conformances, date of last inspection. Information will also need to pass from AHDH to ADF on matters such as prosecutions and changes to legislation/guidance.

8.4 Greater inspection of equipment by ADF auditors: ADF have indicated a willingness to include this in their audits.

9. Implementation and Review

9.1 It is proposed that once a revised policy is agreed, it will be monitored annually. A review will occur after 12 months when an analysis of the risk categorisation of category 2 farms will be undertaken. This will help inform whether the policy for reducing the frequency of inspections could be extended to include category 2 farms (option 3). A full evaluation will be undertaken once the full policy has been established for at least five years.

Specific Impact Tests: Checklist

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	Yes
Small Firms Impact Test	No	Yes
Legal Aid	No	No
Sustainable Development	No	Yes
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	Yes	No
Race Equality	No	Yes
Disability Equality	No	Yes
Gender Equality	No	Yes
Human Rights	No	No
Rural Proofing	No	Yes

Competition Assessment

The preferred option may provide an advantage for low risk (category 3 and 4) farms but encourages higher risk farms to increase compliance with hygiene regulations and also makes better use of enforcement resources.

Small Firms Impact Test

Small firms are a feature of dairy farms, with around 98.73% being micro firms.³⁰ Therefore the proposed option will be highly beneficial to the small firms sector.

Sustainable development

Impacts under the three pillars of sustainable development (environmental, economic and social) have been, and continue to be, considered in this Impact Assessment in the main evidence base. Option 2 is the relatively more sustainable option because it reduces the costs of inspection on farms that are low risk and have Assured Dairy Farm status without compromising consumer safety.

Race/Gender/Disability equality issues

The FSA does not envisage an impact

Rural proofing

The proposal would positively impact rural areas, as dairy farms are located in rural areas. However, the present rural/urban balance would remain unaffected.

We invite stakeholders to comment on the above assessments.

³⁰ According to SIC data – reference here

Annex 1: Summary of Analysis Comparing Outcome of AHDH inspections and ADF Audits

As part of their official inspections on dairy farms AHDH classify the risk of each farmⁱ. Farms that are members of farm assurance schemes are also audited by ADF, with non-conformances against the ADF standard recorded. This analysis aimed to determine the feasibility of using ADF audit results to inform AHDH inspection frequency by comparing the risk categorisation of farms following their AHDH inspections with the number of relevant non-conformances following their ADF audit and considering the similarities and differences in categorisations from both schemes.

The following diagram summarises the steps of the analysis along with the main results of each step:

1. Combined the AHDH and ADF databases to match individual farm assessments across both schemesⁱⁱ.

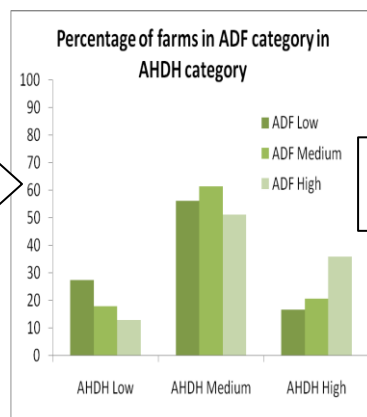
Grouped relevant ADF non-conformances into high, medium, lowⁱⁱⁱ to achieve a good alignment with AHDH categories.

Results

- 46% of farms received the same assessment from both schemes
- 13% of farms were assessed as higher risk by ADF
- 41% of farms were assessed as higher risk by AHDH

2. Looked for correlation between ADF and AHDH assessments and examined the extent of alignment across risk categories.

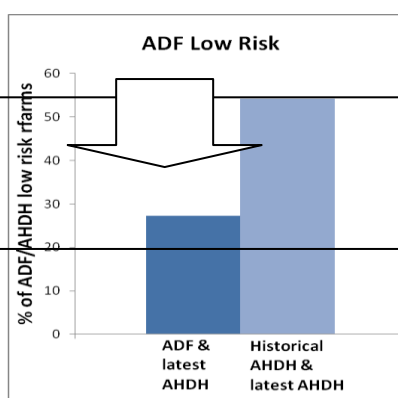
Results



Which means

There was a general correlation between ADF and AHDH risk ratings:

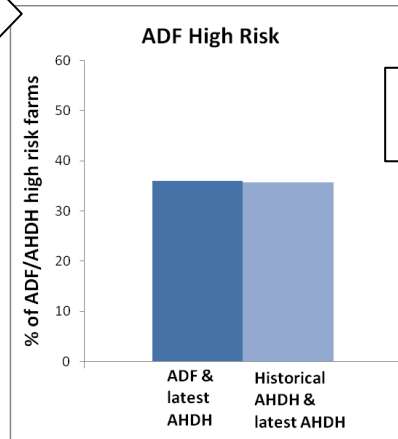
- More ADF low risk farms in AHDH low risk than in other ADF categories
- More ADF high risk farms in AHDH high risk than in other ADF categories
- Differences were less clear for AHDH medium risk farms. A large number of farms are in this group and ADF does not differentiate between them.



3. Looked at assessments through comparing historical AHDH and ADF assessments to the latest AHDH rating.

This should suggest which scheme is a better indicator of future compliance.

Results

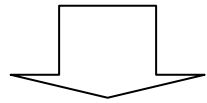


Which means

Previous AHDH assessment as **low** risk is a better indicator of future compliance than ADF assessment.

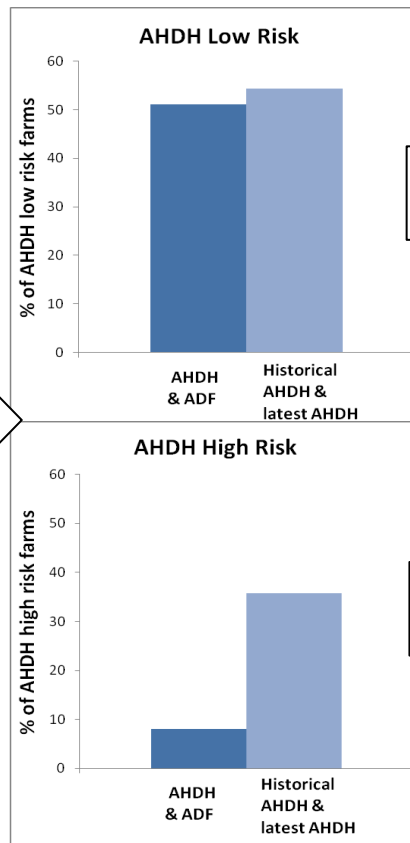
Which means

ADF assessment as **high** risk is as good an indicator of future compliance as the previous AHDH assessment.



4. Looked at assessments through comparing historical AHDH assessments to the latest AHDH and ADF assessments. This should suggest which scheme is a better indicator of future compliance.

Results



Which means

Where AHDH has already assessed farms as **low** risk, ADF assessment is as good an indicator of future compliance as previous AHDH assessment.

Which means

Where AHDH has already assessed farms as **high** risk, the previous AHDH inspection is a better indicator of future compliance than the ADF assessment

Conclusions

- For category 3 and 4 farms (approximately equivalent to low) the ADF assessment can be used to determine AHDH inspection frequency. The ADF assessment was comparable to the AHDH assessment in predicting future membership of the low risk category– 54% of farms assessed as low risk by AHDH were assessed at their next AHDH inspection as low risk, while 51% were assessed as low risk (receiving 0 n/cs) in their ADF audit. Therefore limited additional risk would be introduced by using ADF assessments.
- For category 2 farms (approximately equivalent to medium, and some overlap with high) AHDH inspection frequency should remain unchanged. There is currently no evidence from this analysis to support the use of ADF assessments for medium risk farms.
- For category 1 farms (approximately equivalent to high) AHDH inspection frequency should remain unchanged. Analysis suggests that the ADF assessment was not a good indicator of future compliance for high risk farms.
- Following the analysis, a random selection of visit records were reviewed where the assessments from both schemes had differed (i.e. farms were assessed as high risk in one scheme and low risk in another). This indicated that the ADF data included some issues that would not be considered relevant to AHDH assessment of risk and could have reduced the extent of alignment between the schemes. It was therefore agreed to repeat the analysis prior to the implementation of the proposed policy and refine the policy as necessary.

¹ Data used in the analysis was drawn from the period Jan 04 to May 08 when AHDH categorised farms as high, medium or low risk. During 2008-09, the FSA consulted on revised AHDH Operating Procedures which, amongst other things, included a revised risk rating and scoring system and farms are now categorised at primary inspections (based on their score) as either category 1, 2, 3, or 4 (category 1 being highest risk and category 4 being lowest risk). The mapping between the old and new risk categorisations is: categories 3 and 4 approximately equivalent to low, category 2 approximately equivalent to medium, and some overlap with high and category 1 approximately equivalent to high.

ⁱⁱ Matching on a combination of postcode and holding number and using assessments where farms received visits from both AHDH and ADF within 6 months of each other.

ⁱⁱⁱ Non-conformances (n/cs) were taken from the hygiene part of the ADF standard, and grouped with low as 0 n/cs, medium as 1-5 n/cs and high as greater than 5 n/cs.

Interested Parties List/ Rhestr o Bawb â Diddordeb

Cate	Barrow	ADAS Wales Chartered Institute of Environmental Health Wales
Julie	Barratt	
V	Taylor	Country Land and Business Association
Moss	Jones	Farm Assured Welsh Livestock
Nick	Fenwick	Farmers' Union of Wales
Heather	McCalman	Grassland Development Centre, IGER
Alan	Horine	Guild of Welsh Lamb & Beef Suppliers
Kirsten	Smith	Hybu Cig Cymru
Gwyn	Howells	Hybu Cig Cymru - Meat Promotion Wales
Sion Aron	Jones	Hybu Cig Cymru/Meat Promotions Wales
Trevor	Johnson	Minton Treharne Davies Ltd
Mary	James	National Farmers Union Cymru
Ed	Rees	National Farmers Union Cymru
Peter	Howells	National Farmers Union Cymru
Helen	Davies	National Sheep Association Cymru Wales
Margaret	Dalton	National Sheep Association Cymru Wales
Stella	Owen	NFU Cymru
Dylan	Morgan	NFU Cymru
Barrie	Jones	Royal Welsh Agricultural Society
Gareth	Walters	Trading Standards Institute (Wales)
	Worthington	
David	n	Welsh Assembly Government
Wynfford	James	Welsh Assembly Government
Rory	O'Sullivan	Welsh Assembly Government
Stephen	Wall	Welsh Assembly Government
Paula	Whitfield	Welsh Assembly Government
Elinor	Plow	Welsh Food Alliance
Don	Thomas	Welsh Lamb and Beef Promotions
Jane	Shepherd	Welsh Local Government Association