

Chapter 3: The Future Delivery Model

Participants were introduced to the FDM during the first workshop, where they discussed their initial reactions to each of the four elements. During the second reconvened workshop, participants discussed the FDM in greater detail. They explored how the FDM could affect different FSA employees, food businesses, consumers, and retailers. This chapter brings together the findings from both workshops.

3.1 Overall reactions to the FDM

Questions were raised about the motivations for changing the current Official Controls.

As described above, participants felt reassured by the current Official Controls process, emphasising the importance of stringent checks to keep food safe. They questioned why this approach would need to be adapted, and worried about the potential consequences to food safety and wider consumer interests such as animal welfare. As a result, they speculated as to whether the FDM reflected problems in the current regulatory approach or wider changes brought about by the UK's exit from the EU.

"It seems to be working... If it ain't broke, don't fix it. The fact that we're not getting lots of people ill, dying from that, from the way they're doing it at the moment. We don't seem to have any major, really bad outbreaks in the food chain, nothing seems to be too bad at the moment. Let's hope it stays like that." - **Initial workshop participant, Wales**

Tailored presence and transparent compliance sparked the most interest.

The tailored presence element of the FDM was a source of concern for participants. They worried that reducing the FSA presence in food businesses would result in a reduction of standards. This aspect of the current Official Controls process had reassured participants, even though there was scepticism about the ability of MHIs to check all carcasses. This meant they worried about a reduction in FSA presence, with some arguing for greater resources towards inspections rather than tailoring the current FSA presence. They were concerned that the FSA was looking at introducing this change as a way to make financial savings.

"Reducing presence with compliant businesses would give them more leeway to not be compliant at times. I thought it was very good that there was someone there constantly over each step. I think it looks like having cutbacks to me." - **Initial workshop participant, Northern Ireland**

Conversely, the transparent compliance element of the FDM was appealing to participants. Publicising information about where meat is coming from and how it had been produced was seen as a good way of empowering retailers and consumers to make more informed decisions. Participants reflected on their limited knowledge and awareness of meat processing before the workshops and felt greater transparency could help to educate consumers. This element consistently received the greatest support from participants across the workshops, and views did

not change significantly as they discussed the topic in more detail.

“I’m interested to hear more about transparent compliance where retailers would know more to be making decisions, and you would have more information on the exact whereabouts of where it’s coming from and what is being dealt with.” - **Initial workshop participant, Northern Ireland**

There was an appreciation for why the FSA is exploring the FDM after hearing the case for change.

At the start of the reconvened workshops, participants were presented with the reasons why the FSA has developed the FDM. This focused on the impact of the COVID-19 pandemic, the process of the UK exiting the EU and technological changes in food production. Participants recognised these factors and understood how they could shape the Official Controls process, drawing on similar experiences from their own industries. For example, they described how their work has changed as a result of the COVID-19 pandemic and technological advances. This meant participants understood the need for the FSA to do the same.

“It makes sense to me, especially the points about COVID. All industries have had to reassess how they can work. That’s a good opportunity to explore what you can do more efficiently or how their roles can change and grow or work remotely.” - **Reconvened workshop participant, England**

Although participants recognised that technological changes might affect food processing, questions were raised about the timing of the FDM and why processes had not been modernised sooner. There were also concerns about the impact of introducing new technology on jobs and the reliability of new systems.

“No matter how good the technology is, unless there is someone there in person, the technology can go wrong, can’t it.” - **Reconvened workshop participant, Wales**

There was a general understanding that the UK’s exit from the EU has triggered changes in food importation and the regulatory system. However, participants were less clear about the detail of how imported food had been checked and therefore what the changes might mean in the future.

3.2 Attitudes towards the four elements of the FDM

The workshops explored views on four of the seven elements of the FDM – tailored presence, clearer accountability, a robust assurance regime and transparent compliance. Below we provide a summary of participants’ attitudes to each element and the reassurances they wanted to see in place under the FDM.

3.2.1 Tailored presence

Participants worried tailored presence could lead to a reduction in compliance.

Spontaneous reactions to tailored presence highlighted concerns about the impact of reducing FSA presence in certain businesses. Participants were concerned this would lead to a reduction in standards as high-performing businesses may start to cut corners if a MHI is no longer present on the production line.

“I’m a little concerned about the first item where they’re offering the idea of reducing FSA presence with compliant businesses. I’m not sure that would drive greater overall compliance.” - **Initial workshop participant, England**

There was some recognition that tailoring resources could improve standards in poor performing businesses.

Some participants described how a reallocation of resources could help to support lower performing businesses and suggested this could improve standards overall. For example, they felt it might be beneficial for MHIs to spend more time at lower performing plants, or that MHIs could spend more time sharing good practice under the FDM. In some cases, this was seen as an opportunity for FSA employees to develop new skills and avoid becoming too close to a food business by spending less time in one place.

“She’ll [FSA employee] be able to see how other plants work and give or take advice on how to improve things. It’s going to broaden her understanding of that whole area.” - **Reconvened workshop participant, Wales**

However, there were also concerns about FSA employees losing knowledge of a specific food business. Participants worried that this could make it more difficult for FSA employees to carry out their role if spread too thinly between multiple locations. They also feared a potential impact on the relationship between FSA employees and food businesses. They felt that spending less time in a plant could make it more difficult for MHIs or Official Veterinarians to influence or encourage businesses to improve their standards.

There was support for an increase in unannounced inspections to ensure standards do not slip.

While participants could see the benefits of a more proportionate approach to the allocation of FSA resources, they feared the impact this could have on standards. Overall, participants were often sceptical about businesses maintaining compliance levels without greater assurance activities and they wanted reassurances that standards would not slip.

In particular, participants emphasised the importance of unannounced inspections as a way of checking whether all businesses are complying with regulations. There was a recognition that reducing the FSA presence in high performing businesses could free up FSA resources and thus allow more unannounced inspections to take place. Participants wanted to make sure these inspections were not predictable for businesses and that inspectors took a thorough approach to checking standards. By taking a business by surprise, participants felt it would be harder for them to prepare and therefore the outcomes of the inspection were more likely to be an accurate portrayal of performance.

“I like the idea of unannounced inspections, but not just for the ones that aren’t performing well. Even the ones that are performing well, you don’t want them to feel they have a free pass. It’s more reassuring to know that at any time there could be an inspection. That is more reassuring, certainly for me anyway.” - **Initial workshop participant, England**

As well as increasing the number of unannounced inspections across all businesses, participants wanted to measure the effects of the FDM on standards. They felt monitoring the implementation of the FDM would enable the FSA to reverse any changes if there is evidence that compliance has reduced under the new model.

“It’s all written down, but it needs a trial run of say six months and look at all the information that has come in. Hopefully, after so long, they could see exactly what’s the best for the FSA.” - **Reconvened workshop participant, Wales**

Summary of reassurances: Tailored presence

- FSA presence should remain the same (or increase) in non-compliant businesses as suggested under the FDM
- FSA staff should not be spread across too many different food businesses. This is important to ensure their workload remains manageable and they have a good understanding and relationship with each business
- a robust assurance regime should be in place to check all businesses are still complying with standards. Greater unannounced inspections could provide reassurance that businesses with a reduced FSA presence are still compliant
- the approach should be trialled to ensure there is no reduction in standards.

3.2.2 Clearer Accountability

There was concern that greater involvement in carcase inspection could result in a conflict of interest for food businesses.

Participants worried that asking food businesses to inspect carcasses could lead to a reduction in standards. They argued that food businesses would have an incentive to approve poor quality meat and that inspections need to be carried out by an independent actor for consumers to have trust in the process. This was seen as particularly important given the potential public health risks if unsafe meat reaches the supply chain.

“I’d be slightly uncomfortable. They might want to cut corners. If there’s no safeguard to check what they’re doing, to monitor that, then it’s open for it to be exploited.” – **Initial workshop participant, England**

Questions were raised about the skills and expertise of food business staff, with many participants arguing that they may not have the skills required to take on carcase inspection. FSA employees were seen as trusted experts by participants, thus they had concerns about this role being taken on by other employees.

It was seen as important for the FSA to provide training to any individuals taking on carcase inspection.

Under this element of the FDM, participants wanted to see an accreditation process to ensure food business employees had the right skills for any new areas of responsibility. They emphasised the importance of independent training and certification to provide reassurance that carcase inspections were being handled appropriately. However, there were concerns about the resource implications of this on businesses, particularly smaller companies that may not be able to fund additional training. Participants emphasised the importance of the FSA continuing to support businesses with compliance activities and wanted to see greater partnership working.

“I feel like a happy medium would be if staff were trained in conducting aspects. It would be beneficial for the FSA to have a leader for those in an area that worked daily and could help them with any issues or just had someone above them to go to. Instead of putting the pressure on staff for a brand new role and then walking away. And having an unexpected inspection maybe once a year or so on. It might be better if they liaised more and worked together in partnership.” – **Reconvened workshop participant, Northern Ireland**

In some cases, participants reflected on the potential for technology to support the clearer accountability element, suggesting it could reduce human error and improve the accuracy of checks. Participants agreed that technology could provide a feasible alternative to a continuous FSA presence on the production line, while checking the performance of food business employees conducting carcase inspections. However, they felt there should be a degree of

human supervision for any new technologies to ensure accuracy and pick up on any errors.

“I saw about cameras and technology. If things are being monitored, people will feel conscious they’re being watched and checked up on. If it’s being done consistently, that could be an alternative.” - **Initial workshop participant, England**

There was a recognition that clearer accountability could lead businesses to take greater pride in their work.

Participants felt that clearer accountability could mean food businesses take greater responsibility and pride in their work, increasing standards and work satisfaction. They recognised how giving businesses greater ownership and responsibility might empower them to improve standards and innovate to make processes more efficient, reflecting on their own experiences of motivation in the workplace.

“As long as they’re still being regulated on a daily basis, the fact they’re taking on a lot of the inspection work is a good thing. It’ll give them pride in their work; show they’re working in a reputable company. It would certainly make retailers feel comfortable using them, given they’re doing the job well.” - **Reconvened workshop participant, England**

However, there was a recognition that food safety is of utmost importance, meaning there can be no room for errors. As such, participants wanted to see wider assurance activities such as unannounced inspections and clear enforcement mechanisms for businesses as well as employees responsible for carrying out carcass inspections. This could include fines and prison sentences as a way of incentivising individual employees to stick to the rules and provide the public with reassurance.

“If you’re leaving it to the business the accountability won’t be picked up until something happens to a consumer and someone gets sick and dies.” - **Initial workshop participant, England.**

Summary of reassurances: Clearer Accountability

(TEXT TO BE ADDED)

3.2.3. Robust Assurance Regime

There was support for a robust assurance regime, with the FSA setting the industry standard.

Participants recognised that enhanced collaboration and data sharing across the wider industry could provide a better chance of identifying when things go wrong in food businesses. It was felt that being transparent about the organisations involved could increase consumer confidence, especially if consumers recognise the companies and are familiar with their standards. For example, participants referred to the Red Tractor Scheme and the RSPCA as familiar brands they trusted. Being transparent about the involvement of these organisations could therefore increase confidence in the process.

“The fact they’ve named the organisations they’re thinking of collaborating with, and being more transparent, I think is a good thing. And sharing information for each other is a good thing. Especially when I can recognise some of those names. Everyone knows the RSPCA, I’ve heard of the Red Tractor. I would trust those kinds of organisations, I think. That, for me, was a good thing.” - **Initial workshop participant, England**

Similarly, participants recognised how FSA data could equip smaller supermarkets and businesses with valuable information. This could allow them to make more informed choices

about their supply chain if they do not have existing assurance processes in place, unlike the larger supermarket chains.

“I think the greater use of multiple sources of data that’s one of the more positives, that they will be able to share multiple sources of data. I could imagine maybe supermarkets and small businesses may not have all the knowledge they need. They may have an awareness, but not the nitty-gritty. I think they will gain from the extra data.” - **Initial workshop participant, Northern Ireland**

Concerns were raised about organisations influencing standards by shaping the FSA’s judgements of regulatory performance.

Participants felt organisations could potentially withhold or selectively share information without a way of the FSA verifying this. As such, there were concerns about giving greater powers to businesses with a wide range of motivations beyond consumer safety. This was a worry for participants who compared this to the current system of independent regulation under the FSA. It was also felt that poor or disjointed communication between different sources of information could result in issues being missed.

Participants questioned how aggregate scores would be agreed. There was a strong desire that the FSA remains independent and has the final say on designing the assurance regime and deciding on any ratings.

“No, I don’t think it is good to share the data. All these different companies are doing their own quality assurance. It’s fine if they want to share their findings but I wouldn’t want to couple it all together. If you try to amalgamate, take five assurances from there and five from there and try to come up with one big one, I see that getting a bit muddy.” - **Initial workshop participant, England.**

Summary of reassurance: Robust Assurance Regime

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3.2.4 Transparent Compliance

There was widespread support for greater transparency

Participants acknowledged the benefits that greater transparency would give consumers including the ability to make more informed choices about what products they buy. This was seen as a positive for consumers who wanted to know where their meat had come from, what hygiene standards had been met and how animals had been treated in the process. Many participants felt they would appreciate having access to this kind of information, either online or on packaging, as well as in restaurants or institutions such as schools. They felt it would influence their decisions on what to buy, with many suggesting they would change their purchasing habits in line with the ratings.

“Thinking about Ofsted, every school has that published and parents get to make a decision off that. I’m sure sometimes that’s not fair, but you can make an informed decision. I think it’s scary that these food businesses don’t have to publish this now.” - **Initial workshop participant, England**

However, participants worried this could lead to a two-tier system if meat with higher ratings became more expensive. They felt there was a risk this could lead to unequal access to quality meat and result in more food waste if lower quality meat became harder to sell.

“There is an awfully big concern about people on benefits and on lower incomes. So now you’re from a lower income background, you should now eat a lower standard of meat? It doesn’t seem fair.” - **Reconvened workshop participant, Northern Ireland**

Transparent compliance was seen as a way to incentivise improvements.

There was a recognition that greater transparency could increase compliance and result in improved standards as businesses would want to protect their reputation and grow. This could also result in poor performing food businesses leaving the market, thus increasing standards across the industry in the long-term.

“I think it’ll work. By and large, it’ll work. The possibility of having the names, the business names, connected with poor performance, in terms of hygiene and food preparation, would be a spur to a lot of businesses to keep within the rules. There’s always going to be the maverick, isn’t there?” - **Initial workshop participant, England**

However, there was some concern for the impact of greater transparency on businesses. For instance, this could result in food businesses losing contracts or closing down if fewer consumers buy products based on their performance rating. Participants recognised how this could treat improving businesses unfairly if results did not reflect recent changes. Nevertheless, they largely felt that the benefits to consumers would outweigh the potential impact on businesses.

There were differing views about the best approach to transparent compliance.

There was support for adding a ratings label onto packaging as a way of increasing information for consumers in an accessible way. Participants argued consumers would be more likely to use information on packaging in comparison to other information sources. In turn, they felt this would encourage supermarkets to stock high performing products, thus increasing standards across the industry.

“I think everyone would love to know exactly where their food is coming from and how it’s being processed. People might buy the lower rated meat as it’s cheaper. I think there would be issues where people might not be truthful in terms of where it comes from.” – **Reconvened workshop participant, Northern Ireland**

There were concerns that if information was not presented in a clear format on packages it could lead to misinterpretations. For example, there were worries this could give the impression that lower rated products were not safe to eat. Participants reflected on their own limited knowledge of meat processing and felt it would be important for the FSA to provide information to educate consumers so they could understand what any performance ratings meant. They also wanted information to be updated on a regular basis so that consumers can make informed choices based on recent performance. There was support for ratings to take into account a number of factors including hygiene and animal welfare standards. However, a small number of participants argued that it would be better not to provide this kind of information due to the potential to cause unnecessary confusion for consumers.

“I wonder how that would be useful to a consumer. I suppose if you buy your meat at a supermarket, you get some information. If, for instance, it was about some random slaughterhouse, how would you know if you’ve consumed from that place? It would be useful to know how they plan to make it useful to the consumer, rather than random figures. And accessible language for the everyday person.” – **Initial workshop participant, England**

Participants who supported information being made available online suggested this would give consumers the option to find out where their food had come from. For some, this was the

preferred approach as they felt it was unlikely to cause misunderstanding among consumers while allowing those who wanted to find out more the option to do so. One participant suggested that packaging could include a QR code that directed consumers to the relevant information online without putting too much additional material on packets themselves. However, there were concerns that this approach would exclude consumers who do not have access to the internet.

“Not everybody’s like me and checks everything. Having the option to do that’s good. If you don’t care, that’s up to you.” – **Reconvened workshop participant, England.**

Summary of reassurances: Transparent compliance

(TEXT TO BE ADDED)