

FSA and Official Controls: Awareness and views on the Operational Transformation Programme

The aim of the OTP was to move towards a more proportionate risk and evidence-based approach to regulation. The FSA explored introducing new technologies in the audit and approvals processes, the potential to take a more risk-based approach to how the FSA utilises its resources and the potential to use a different regulatory approach following changes to current legislation.

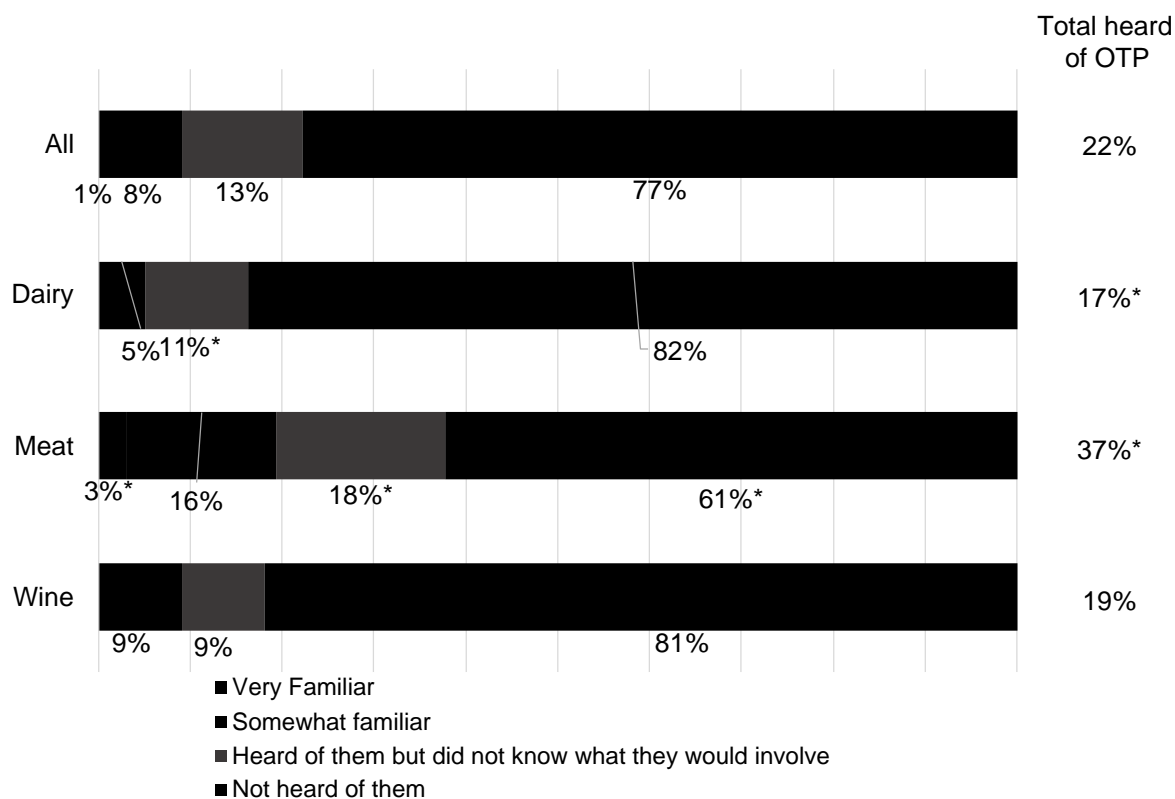
Since the research was conducted, the FSA has now brought all regulatory transformation activity and thinking into one place. The FSA has transitioned the resource and consideration of work for longer-term reform/legislative planning to sit under its Achieving Business Compliance programme. Work relating to improvements within the existing regulatory framework will now come under a new Operational Modernisation programme in Operations. More information on the OTP changes can be found in the FSA Board meeting papers for December 2022.

This chapter examines how familiar FBOs were with the OTP, how they have heard of it, and if they think the OTP initiatives would make it easier or more difficult to comply with FSA regulations.

Familiarity with the OTP

All FBOs were asked how familiar they were with the OTP and the initiatives which are planned to be introduced by the FSA. Just over one-fifth (22%) had heard of the OTP and its initiatives, although only one per cent considered themselves to be very familiar. FBOs in the meat sector were more likely to have heard of the OTP (37%) when compared to the average (22%) and more likely to be familiar with the OTP (19%) compared to the average (9%), as shown in Figure 10.1.

Figure 10.1 Awareness of the Operational Transformation Programme and its initiatives



Base: Dairy 2022 (264), Dairy 2020 (200). Arrows indicate significant difference from 2020. * Indicates significant difference from all in 2022.

G1: How familiar were you of OTP and the initiatives which are planned to be introduced by the FSA? Base: All businesses except in the shellfish sector (395); Dairy (264), Meat (99), Wine (32). ‘*’ indicates a significant difference from all other sectors. Don’t know figures have not been presented in the chart.

Those based in England were also more likely to have heard of the OTP (24%), compared to those in Wales (14%). Additionally FBOs who had communicated with the FSA in the last month showed greater levels of awareness than those who had not (38% had heard of the OTP compared with 19%).

Sources of engagement

FBOs who had heard of the OTP were asked if they had any engagement with the FSA directly or via a trade association about the OTP. Only a small proportion of FBOs who had heard of the OTP reported that they had had engagement with either the FSA (9%), a trade association (7%) or both (5%) about the OTP. In total this accounts for less than 5% of all FBOs who had knowingly received communication about the OTP from these sources.

Impact of OTP changes

FBOs who had heard of the OTP were asked if they thought the OTP initiatives would make it easier or more difficult to comply with FSA regulations. Half (51%) thought it would be easier (including 3% who thought it would make compliance 'a lot' easier), with around a fifth being neutral (18%) and close to one in 10 (9%) believing it would be more difficult. Those in the meat sector were more likely to consider it to become easier (70%) when compared to those in the dairy sector (41%).

Reflecting the low levels of awareness captured in the quantitative survey, most of the FBOs in the qualitative interviews were unable to articulate the likely impacts of the OTP for their business.

However, one FBO did state that there was a lack of consultation and was unclear on what the changes would mean for small game businesses, indicating that the FSA could do more to protect and support them. (It is worth noting that a consultation was held in 2021 with stakeholders in the meat sector; [Consultation on Early Proposals for a Future Delivery Model for FSA-Delivered Official Controls in the Meat Sector](#)).

"Gaming is a small industry and certain departments within DEFRA probably don't consider us worth thinking about. They put in legislation that does not work, and we're having to fight with that. The FSA aren't working with us...we're fighting the FSA." (Meat, England)

One FBO pointed out that it would probably make things marginally easier for them with a reduced number of audits, but they wondered whether consumers would be comfortable with the changes.

Those that had not heard of the OTP were re-read the description provided in the survey and asked if they thought it would impact their ability to comply with FSA regulations. Reactions were mixed, with some thinking it sounded like a good change that could work well.

"Anything that's risk-based is a good thing, because it focuses you on the core things in your business that could cause problems." (Wine, England)

However, others were cautious and worried about how the changes would be implemented, and whether they would be consulted, or were concerned about it involving more work for the FBOs.

"It sounds very good in principle, whether it will work with the current system [where the Official Vets are inconsistent], I don't think so." (Meat, England)

"The wine industry has very intelligent and vocal people and could be used to refine proposal and policy." (Wine, England)

"It does make it more difficult because there is more to do but you are selling produce to the public...there is a reason why we have to do this and why we have to do Red Tractor...it is all joined up." (Dairy, Wales)