

Update on Veterinary Supply, Modernisation and Support for the Small Abattoir Sector for 2023/24

FSA 23-06-08 - This paper provides an update on Veterinary Supply, Modernisation and support for the small Abattoir Sector for 2023 to 2024.

Report by Junior Johnson.

1. The FSA Board is asked to:

- note the current risks to veterinary supply and the work we are doing with the Royal College of Veterinary Surgeons (RCVS), our Service Delivery Partner and across government to mitigate these
- note our key areas of focus for further improving our delivery of Official Controls in the meat sector for 2023/24
- note our prioritisation decisions and plans in terms of operational modernisation and endorse the approach we are taking
- note the activities being undertaken to support the small abattoir sector.

2. Introduction

2.1 Risk 7 on the FSA's corporate risk register outlines the possibility of the FSA failing to deliver Official Controls in England and Wales for meat production. Doing so would affect the country's meat supply and would result in a loss or lack of trust and confidence in the FSA from consumers, business, government and/or other stakeholders.

2.2 Alongside providing an appropriate response to a major food or feed incident, the FSA's Executive Management Team (EMT) consider the reliable and efficient delivery of Official Controls to be essential to "doing the day job exceptionally well." This paper provides an update to the Board on the things we are doing to ensure that we provide reliable and efficient Official Controls. The activities fall broadly into three areas:

- a) **Service reliability:** shoring up the reliability of our service and improving its quality through the recruitment, training and retention of the veterinary resources we need to fulfil our regulatory obligations;
- b) **Modernisation:** improving the quality and cost effectiveness of our delivery through enhanced capability and better use of technology to gather, store and utilise data more effectively, under an Operations Modernisation programme that is the successor to the Operational Transformation Programme (OTP), which was formally closed in December 2022. At that meeting, the Board asked for more detail about what would be in the modernisation programme, and this is covered in this paper.

c) **Small abattoirs:** work to support the small abattoir sector by taking a more collaborative, supportive and proportionate approach wherever possible.

2.3 Note that the identified priorities are specific to England and Wales but may offer opportunities for adoption of policy and operational improvements in Northern Ireland. Food Standards Scotland (FSS) and the FSA work closely together on these matters too.

2.4 [In December 2022, the Board agreed](#), following careful consideration, not to pursue regulatory reform in the meat sector and felt that now was not the time for a dual regulatory system for domestic and export production. The Board therefore endorsed the FSA Executive's decision that it was appropriate to end the Operational Transformation Programme and its ambition to amend the responsibilities of vets and meat hygiene inspectors for domestically produced and consumed meat for now at least.

2.5 The FSA's ongoing effort in this area would be on modernisation and continuous improvement work that can be achieved within the existing regulatory framework. Future transformation work (involving significant policy or legislative change) in meat, dairy and wine would be aligned to similar work being pursued in the Achieving Business Compliance Programme, looking at the long-term future of the regulatory system.

3. Part A: Improving Quality and Reliability of Veterinary Supply

3.1 Workforce shortages are a key challenge facing the whole veterinary profession in the UK and worldwide. This challenge has been exacerbated significantly by recent events, including a Covid-19 backlog of care, the pet boom during the pandemic, and longer-term changes in pay, work-life balance, and client expectations, resulting in high rates of dissatisfaction and burnout with around 45% of young vets leaving the profession doing so within their first four years of graduation.

3.2 The recruitment and retention issues are particularly acute in the meat industry, which is often seen as less attractive than other veterinary environments. Our Official Veterinarians (OV) attrition stands at around 30% per annum (this compares to 10% attrition for the FSA in general), with most going into clinical practice or other government roles in the UK. Across government, Food Standards Scotland, using a direct employment model, also brings in overseas vets through temporary registration, and the Animal and Plant Health Agency (APHA) currently has high levels of veterinary vacancies that they are struggling to fill.

3.3 Many of our OVs entering the UK profession over recent years have used the RCVS scheme which allows FSA and our Service Delivery Partner (SDP) bulk temporary registration of overseas graduates with Level 5 English to work as Novice Official Veterinarians (NOVs) while they achieve their level 7 English. Level 7 is required to be a full member of RCVS and therefore a fully qualified OV. In June 2022, the RCVS extended our use of this temporary scheme by a further year, subject to a clear exit strategy being developed, and further reviews by RCVS Council.

3.4 In June 2023 RCVS will consider whether this use of the temporary scheme should be extended again. Should this not be granted, then within 5-6 months FSA will have insufficient OV s to cover all plants at current rates of operation, and contingency plans will need to be drawn upon, to maintain animal welfare and food supply.

3.5 Using all that we have learnt over the last two years of operating the temporary registration (TR) scheme, we have worked with our SDP to develop a proposal to the RCVS Council which both reforms the approach and delivers a challenging but, under current assumptions, realistic

reduction in our reliance on TR.

3.6 From July 2023 our SDP will start to only recruit vets who already have level 6 English as Temporary Registered NOVS (TRNOVs). The SDP is confident that there is a robust pipeline of applicants with Level 6 English to achieve this, and data shows that 98% of this group achieve Level 7 within 12-18 months.

3.7 Vets from European Association of Establishments for Veterinary Education (EAEVE) accredited vet schools with a starting level of English between Level 5 and Level 6, will be recruited by the SDP on a two-year “Meat Hygiene Inspector (MHI) vet track” scheme, receiving structured English tuition to bring them up to Level 7 within that time whilst working as MHIs and gaining wider skills and knowledge of the UK industry and delivery of Official Controls.

3.8 We believe this approach over the coming three years will secure our supply chain, and address issues of inexperience which can, as in any profession, impact quality of delivery.

3.9 We shared our draft proposals with the RCVS Standards Committee in May, where we received helpful and constructive feedback. Our full proposals will be considered by RCVS Council on 8 June 2023, and the Board will be updated verbally on the outcome, and should the proposal not be accepted, on any subsequent need to invoke contingency measures to assure delivery of official controls with a reducing workforce.

4. Part B: Improving Service Efficiency and Cost Effectiveness through modernisation

4.1 Our activities here will focus on better use of technology and digital tools to improve the quality and accuracy of data between FSA and Food Business Operators (FBOs) that is used to inform decision-making across Operations. This will ease the administrative burden on industry and the FSA, ensure better and more responsive decision making and lead to quicker remedial actions by industry to improve compliance.

4.2 The work plan for 2023/24 has been subject to a rigorous prioritisation exercise to establish a pipeline for this work over the forthcoming year and beyond.

4.3 The following modernisation projects are to be taken forward in 2023/24:

Improving the quality and accuracy of inspection data collection

4.4 **Background:** There are a range of clerical/manual tools as well as modern FBO systems used in meat plants to gather ante- and post-mortem inspection results. This information is used by FSA, FBOs and livestock producers/vets to assess performance, monitor trends and take action to ensure ongoing compliance in both food production and animal welfare. It is a legal requirement for OVVs to collect and communicate the results to the FBO and primary producer.

Two separate internal audits into data quality have highlighted that many of the current tools/processes are outdated, prone to error and difficult to validate, and where modern FBO systems are used, there is no timely method for automatically transferring that data into FSA systems.

4.5 **Planned for 2023/24:** We want to establish better data links between FBO and FSA systems to automatically share critical data to improve accuracy and consistency by reducing levels of manual input. This will include mapping all the data we collect to ensure we are capturing only what we need. We will design and test a live data link by March 2024. We will also identify and trial additional digital devices for FSA operatives to collect and upload inspection data where FBO data collection systems are not in place.

4.6 Impact: Introducing in-plant digital tools will also remove the need for manual data input following inspection activity. This year we will test and start to roll-out a direct data link in FBOs with digital systems which would in due course, cover 24% and 46% of poultry and red meat throughput, respectively. The direct data link and in-plant digital devices will improve data accuracy by removing errors associated with re-keying and significantly reduce the time we spend each day manually entering information (currently circa 45 minutes per agent in every plant across England and Wales). The second element is dependent on identifying suitable digital devices that are affordable and can cope with the challenging and messy operational environment of an abattoir.

New Case management functionality for enforcement

4.7 Background: Chronos is the national IT system used to store details of enforcement activity taken by OV's. This is an outdated system with limited access and transparency of data for users, has sub-optimal data input functionality and the ability to make changes/improvements is constrained by the technology. This means that it cannot support the introduction of business-critical changes (such as the ability to separately record enforcement activity relating specifically to third country requirements which constrains the ability to track and analyse third country enforcement activity).

4.8 Planned for 2023/24: In early 2023/24, we are undertaking a feasibility study to explore options for upgrading or replacing the Chronos system to address the current shortfalls and to ensure there is sufficient technical flexibility to support future changes. Industry have been requesting access to enforcement information for several years. The feasibility study will build on the Digital Approvals work started in 2022 as part of considering options to introduce an account-based system that allows FBOs to access and view their enforcement data by March 2024, subject to affordability.

4.9 Impact: The feasibility study will inform longer-term changes to our enforcement IT system that will enable future business critical changes ensuring longer term resilience and flexibility. In the short/medium term, this work will inform options, costs, and timescales for ensuring improved data entry, quicker and easier access to plant specific enforcement results that will lead to more responsive and robust analysis and decision making and quicker remedial action with industry to improve compliance and food safety.

Using Digital Technology to support remote interventions

4.10 Background: Remote Technology was launched in 2021 and is in regular use to allow veterinary auditors to undertake remote audits where it is not possible or practical to visit a plant. This technology allows video, audio, and photographic evidence to be gathered and stored securely to assist in making decisions that contribute to improving levels of industry compliance with Official Controls.

4.11 Planned for 2023/24: having confirmed that this technology is effective for some audit activities, its application is now being piloted in other operational processes associated with ensuring compliance with Official Controls to establish wider adoption during 2023/24 (including approvals, animal welfare and enforcement activity). A formal tender exercise will be undertaken to ensure continuity of service when the current service provider contract for this technology comes to an end in October 2023.

4.12 Impact: the wider application of remote technology will expand the benefits already seen with the Vet Audit team, for example reduced processing times, quicker evidence-based decision making, savings in relation to time and fuel costs associated with on-site visits and environmental savings associated with reduced carbon footprint as a result of less frequent travel.

Introduction digital audit and inspection capability

4.13 Background: There is significant variation in the information and tasks performed in carrying out audit and inspection activity across meat, dairy and wine. Several systems have been developed in a piecemeal way over years to support these functions whilst much activity still relies on paper and pen and on manual data entry. This has resulted in inconsistencies in the ability to gather and access information quickly and accurately. For example, there are currently 20 meat auditors who conduct 600 full audits per year, all of which involve manual activity to collect and analyse information before an audit, to gather evidence/information during the audit and to review and produce reports after the audit. This involves the collection, collation and analysis of information relating to enforcement, animal welfare, hygiene, operational processes, pest, water and temperature control, performance, and product documentation. Digitising the activities to collate information and generate reports will improve consistency, job satisfaction, and save processing time.

4.14 Planned for 2023/24: Despite the variations between audit and inspection needs, there are several common activities around gathering information; making, and documenting evidence-based decisions; and drafting and issuing reports. During 2023/24 discovery activity is to be undertaken to identify one or more aligned solutions that can be used to provide digital capability to support audit and inspection activity, whilst at the same time reviewing business processes and validating what data we collect and why. Moving beyond the initial discovery into delivery will depend on available budget during 2023/24.

4.15 Impact: Improved digital capability will ensure more accurate, secure, and quicker collection of information, improved decision making and report generation leading to greater focus on critical areas of non-compliance, faster remedial action following audit and inspection activity, improved compliance, and reduced risk in food safety. The reduction in administrative overhead for auditors and inspectors through automation of data gather and report generation will enhance their user experience and allow them to focus on additional value-add activities such as data and trend analysis.

Using a Compliance Risk Assessment Model to inform Operational Interventions

4.16 Background: one of the FSA's ambitions is to deploy routine meat inspection and veterinary resources based on risk and compliance history, however this transformational change would require new legislation and is assumed at this stage to be a longer-term deliverable. We plan to adapt and simplify the segmentation data model that was built and piloted last year to target assurance and investigative resources and interventions where this is permissible under the current regulations and where it will have the greatest impact on food safety (for example around audit frequency, animal welfare and unannounced inspection interventions, and veterinary supervisory visits). The development of a risk assessment tool will allow FSA to objectively assess risk and more effectively support/challenge FBOs making it easier for them to "do the right thing" and remain compliant.

4.17 Planned for 2023/24: During Q1/2 we will design a risk assessment tool for a specific business sector that uses pre-defined risk indicators to generate a clear and explainable FBO compliance risk score. This will be piloted/tested during Q3/4 in parallel to investigation and agreement as to how this score will be used to take a more informed risk-based and objective assessment on the frequency and/or nature of operational intervention activities in the future. There are several cultural challenges that need to be overcome in adopting a more targeted approach to intervention and regulation and we will instigate work alongside the risk tool development to prepare our audit, inspection, and welfare visits communities for the changes to working practices this will involve. We will also use this opportunity to learn and adopt similar

principals from the risk assessment work being undertaken for Local Authority food hygiene interventions.

4.18 Impact: focusing intervention activity based on an objective risk assessment will help us to target our valuable resources at non-compliant FBOs more effectively, with the aim of delivering improved compliance, reduced food safety risks and an increase in consumer confidence in FSA as an effective regulator.

5. Part C: Supporting the Small Abattoir Sector

5.1 FSA Operations have a well-established working relationship with the small abattoir sector and connected stakeholders that has recognised the challenges and different operational landscapes small abattoirs operate within. The range of challenges facing the sector include access to skilled labour, utility and transport costs, financial viability, geographical reach within rural economies and the operational regulatory framework. There is recognised importance in the supply of a specialist service to rural communities which also includes the rearing of rare breed species and provision of locally defined meat. The small abattoir sector consequently supports the local economies of agriculture, butchery, and retail outlets.

5.2 Deliverables: The FSA, with industry, are undertaking several initiatives to help facilitate a more proportionate approach to the regulation of this sector.

5.3 Reducing Administration: A pilot was undertaken in 2021/22 to simplify daily administration for operators of small abattoirs through the introduction of a daily diary for required checks and recording subsequent actions. This process has now been adopted by nine FBOs who now operate more efficiently and effectively. We have recently established a new cohort of between 15-20 interested FBOs and plan to rollout the initiative out in the summer of 2023 with technical support from FSA Field Operations.

5.4 Exploring Changes to the Low-Capacity Limit Policy Initiatives: FSA officials in Operations and Policy are working with Defra to assess the risk of extending the low-capacity limit to a wider range of small abattoirs. Existing legislation provides some flexibilities with the application of Official Controls for low-capacity premises, defined as up to 1000 livestock units processed per annum. The flexibilities of interest to the small abattoir sector include reducing OV attendance to “cold inspection” at the end of daily operations or replacing with Official Auxiliary (OA) (Meat Hygiene Inspector) attendance to complete post-mortem inspection and to verify all necessary controls are satisfactory. There are currently 15 small abattoirs utilising the available flexibilities. The Official Controls Regulations (OCR) allow for the threshold to be extended to a 5% limit of a country’s total throughput. This requires consent from the European Commission with assurance that there are no increased risks arising from a policy change. FSA Operations have held early discussions with wider operational teams in Wales, Northern Ireland and Scotland who are supportive of the potential policy change. FSA science and policy teams have produced a risk assessment to assess the impact of increasing the flexibilities to more small abattoirs. The scope of the risk assessment includes risks to hygiene, disease identification and control; and animal welfare in relation to applying flexibilities in Official Controls delivery to an increased number of small abattoirs. The initial assessment suggests any potential policy change could benefit approximately 13 small abattoirs subject to meeting specific operational criteria. The policy change could also allow some small abattoirs to increase production without losing current flexibilities.

5.5 Raising Profile and Improved Engagement: Through focussed resource we have: introduced the reduced administration initiative; facilitated small abattoir site visits for the Minister for Food, Farming and Fisheries, Mark Spencer; provided support at ministerial round table events; and made early contributions towards planning the forthcoming grant scheme for small abattoirs in England. Our engagement has focussed on the higher reliance on established

working relationships with experienced individuals to aid smoother working through intricate knowledge of specific premises. We have improved local relationships through face-to-face visits to ensure small abattoir operators are aware of their local FSA management structure and contact points and we have included our service delivery partner to demonstrate joint working and focus on local delivery needs.

5.6 The low-capacity flexibilities risk assessment has identified a negligible increase in risk.

During June we will work with Defra to share this with stakeholders and trade partners. This includes a joint submission to the Chief Veterinary Officer (CVO) and supporting Ministerial level briefings and any possible onward support for Defra's potential discussions with the European Commission on policy change, and engagement with trading partners on implementation.

5.7 We will also provide representation and contributions (such as evidence of regulatory compliance, and conditional approval of proposed capital investment affecting premises structure) to the planning and delivery of the Defra grant funding scheme for eligible small abattoirs. This will support small abattoir operators with capital investment to improve processing and gain efficiencies.

6. FSA Board Action required:

6.1 FSA Board is invited to:

- note the current risks to veterinary supply and the work we are doing with the Royal College of Veterinary Surgeons (RCVS) and our Service Delivery Partner to mitigate these
- note our key areas of focus for further improving our delivery of Official Controls in the meat sector for 2023/24
- note our prioritisation decisions and plans in terms of operational modernisation and endorse the approach we are taking
- note the activities being undertaken to support the small abattoir sector
- note that future updates on Operations Modernisation activities will be made to the Business Committee as routine operational business.