Mr Richard Collier  
Food Standards Agency

To: discount.consultation@foodstandards.gsi.gov.uk  
Cc: richard.collier@foodstandards.gsi.gov.uk

11th June 2015

FSA Consultation  
Official Controls Charges in Meat Premises: A Proposal for a New Discount System

BPC Response

1. BPC contact: Richard Griffiths, rgriffiths@britishpoultry.org.uk, 07545 922117

2. The British Poultry Council (BPC) represents over 90% by volume of production of poultry meat in the UK, and is a recognised and consistent stakeholder in partnership with the UK Government. We welcome the opportunity to comment on the above named consultation. The specific questions asked in the consultation are answered below, accompanied by other relevant comments on the proposal.

Summary

3. The BPC strongly supports option 1: do nothing. The BPC wants to see the following steps taken before a change to the charging system should even be considered. We have an inspection service that is not fit-for-purpose, both from its cost and outcomes, and we need to address that as a matter of urgency. We must:

   a. Enable PIAs to be employed at competitive commercial rates.
   b. Trial an alternative inspection system for poultry - microbiological controls instead of visual inspection.
   c. Trial reduction of OV presence.
   d. Incorporate recommendations from the forthcoming Commission proposal for poultry meat inspection.
   e. Complete the process of the OFFC review.
4. These steps will negate the need to review the charging system and provide cost savings for the industry and the FSA.

Discussion

5. The FSA consultation is based on a premise that the current charging system is unfair and distorts the market [covering letter, para.3; para.9; para.15; para.17; para.22; para.26], and yet it fails to provide data to support that assertion. Instead it has chosen to rely on hearsay and 'common knowledge'. Conversely the change being proposed does interfere with healthy competition, and for this the FSA has provided a fully costed impact assessment.

6. The BPC objects to the proposal made in the consultation. On the grounds that the existing charging system is not unfair, and has not affected how the market has developed, grown, and improved productivity over time.

7. A request was made to view the financial or other evidence the FSA used to arrive at the conclusion that the current system distorts the market. Such evidence was not available. The request and subsequent response are included in an annex. The response to the request stated that ...On a number of occasions the FSA has asked industry for evidence of the impact of charges for meat official controls but there has been very little if any response...[para.2, page 3]. Additionally the FSA never received a legal challenge against the principles of the Maclean system, and only one since the change to time-based charging in 2009/10. From this it must be concluded that the meat industry does not consider the current charging system to affect the market.

8. The Maclean system was introduced in 2000/01 and was generally agreed to the most equitable system available at the time [the Scottish impact assessment is the only IA still available and in para.3 it states: ...there is no perceived hazard, or situation, which would lead to any harm or detriment to any individual or organisation.]. At the point of introduction the cost of meat inspection was indexed against productivity, and all producers were paying the same cost per livestock unit.

9. From the introduction of Maclean to 2009/10 the charges made by the FSA to industry increased by a small amount (approximately 5% each year). This rise was sometimes initiated by the need to meet the EU minima charge in line with currency rate fluctuations, and on one occasion (2007/08) the FSA decided that poultry meat inspectors should be dual-trained for red meat and their rates raised by 15%. At no time across that ten year period has it been proven that this predictable cost was distorting the market, and the FSA has presented no evidence to demonstrate that it did. Instead the market moved around the inspection charge for reasons utterly unconnected with it.
10. In that period consumption (demand) increased dramatically and productivity (supply) increased to meet it. Technology accepted the challenge and took leaps forward throughout the production chain. Genetics, FCR, growth rates, logistics, processing, refrigeration, and packaging all improved dramatically. The resulting increase in productivity was dramatic and spectacularly overshadows the constant cost of meat inspection. [760.3 million birds slaughtered in 2000 and 862.6 million birds slaughtered in 2010: Defra]. At the same time production was consolidated into fewer slaughterhouses with ever increasing line speed; leading to economies of scale of production cost per bird.

11. The charging system was not a point of contention either at the beginning of Maclean or when time-based charging was introduced. It became an illogical and irrational excuse for those whose productivity increases could not keep up with their competitors. Throughout this period the meat inspection charges remained, relatively stable. A part of the market yet impotent to affect it.

12. In 2009/10 the FSA reacted to the Tierney review and changed its calculation methodology from throughput to time-based charges. The initial calculation was made using the charge of the final year of throughput assessment, so as to begin the new system cost-neutral. All this achieved was to extend the legacy of the Maclean system through the next five years to where we are today.

13. Fifteen years after Maclean was begun meat inspection charges have remained broadly stable, but productivity increases year-on-year. It is fanciful to claim that the existing system has distorted the market, and as shown by this consultation it is a claim wholly unsubstantiated.

14. The FSA wishes to recover more of its costs, regardless of whether those costs are proportional or justified. Various reasons have increased the full cost of meat inspection, some within the control of the FSA and some not. The result is that FSA costs have increased faster than charges made to industry. The FSA has tried desperately to increase charges but has been knocked-back by more far-sighted parts of Government. The proposal in this consultation is a thinly veiled first step in clawing back costs for a monopoly service that is not fit-for-purpose by any food safety or market-driven measure.

15. The fundamental question posed by the consultation is one of fairness, although whether that means moral fairness or mathematical equitability is not explained. What is undoubtedly unfair is the continuation of an inspection system in poultry plants that makes no contribution to food safety or public health. This is directly relevant to this consultation as producers are now being asked to pay more for a
service that does not work; and bad enough that they have to pay for such a service at all.

16. The inflated and uncommercial civil service terms and conditions enjoyed by meat inspectors are directly relevant. Had the FSA not allowed these to spiral out of control over the last fifteen years it would now be in a much better position. We are left with the wrong service and an inflated cost for it.

17. Meat inspection is a complex network of issues and regulation, many of which need urgent and fundamental change. A number of those issues, if addressed correctly, will automatically reduce costs and negate the entire discussion about how charges are apportioned. Work is now beginning on what the future of meat inspection will look like, both in the EU and the UK. The FSA should be trying to fix the purpose of the system, not trying to claim back bloated costs of its own making.

18. With regard to the options presented in the consultation the BPC strongly supports option 1 of do nothing. The grounds for this are:
   a. The premise of the consultation, that the current system has distorted the market, is unproven.
   b. Healthy competition between producers has driven the market.
   c. The preferred option in the consultation distorts the market, not the current charging system.
   d. Changing the charging system is not the solution to reducing costs.
   e. The system being proposed to support PIA costs does little to encourage their uptake in the first instance.

Questions in the consultation

19. The response to the questions in the consultation are below. We dispute that there has been any moral unfairness in the current charging system and so these answers are made from the perspective of mathematical equitability.

Q1. If a charging system with a discount applied were to be started from scratch with no previous system in place then an income tax style banding would seem workable.

Q2. No single sector should be saddled with a system that panders to other sectors that have consistently demonstrated less productivity and less efficiency in the use of FSA resources.

Q3. & Q4. Carry forward and adjustment to allow for charging in the transaction period seem sensible accounting processes.
Q5. The proposed order of roles charged for seems reasonable.

Q6. To set the bands at the start of a year seems a sensible accounting process.

Q7. Given how cutting plants use services then charging full cost should not be impactful.

Q8. The proposed adjustment for the EU minima seems a sensible accounting process.

Q9. No option other than 'do nothing' should be implemented in 2016.

Q10. Using the previous year's figure to establish bands seems a sensible accounting process.

Q11. & Q12. Standardising allowances and setting the 50% level seem like sensible accounting processes.

Q13. The proposed step in the event of a change of FBO seems like a sensible accounting process.

Q14. & Q15. The impact assessment is accurate. It clearly and concisely demonstrates how and by how much the preferred option will distort the market.

Q16. All poultry producers that use MHIs are interested in moving to PIAs. However, the proposal makes no effort to allow producers to introduce PIAs at a competitive commercial rate. The FSA must deal with its internal contractual problems before foisting cost onto producers. PIAs at competitive commercial rates would, and it has been proven, save money for both FBOs and the FSA. That the FSA has allowed this situation to drag on over so long has cost it many millions of pounds every year. Once again the FSA's short-sightedness is being hidden behind a pretence of making the system fairer for producers, when historically the only detriment has been to the FSA.

Q17. Q18. & Q19. In the context of what is a complicated and distorting proposal anything that helps producers use PIAs is welcome.

Q20. Three years of relief on TUPE’d PIAs is insufficient against the potential gains for having PIAs at competitive commercial rates.

Q21. A limit on data returns seems like a sensible accounting process.
20. The BPC wants to see the following steps taken before a change to the charging system should even be considered. We have an inspection service that is not fit-for-purpose, both from its cost and outcomes, and we need to address that as a matter of urgency. We must:

   a. Enable PIAs to be employed at competitive commercial rates.
   b. Trial an alternative inspection system for poultry - microbiological controls instead of visual inspection.
   c. Trial reduction of OV presence.
   d. Incorporate recommendations from the forthcoming Commission proposal for poultry meat inspection.
   e. Complete the process of the OFFC review.

21. These steps will negate the need to review the charging system and provide cost savings for the industry and the FSA.

PIAs

22. The FSA has declared that it is open to discussion on reduction of costs, as part of the wider Government measures. The poultry industry has demonstrated that moving to PIAs at market rates will be a significant cost saving to both the FSA and FBOs. The added consideration for PIA use in the consultation recognises the benefits of PIA use but does not go far enough.

23. The industry wants to use PIAs at commercial rates, but there is an interim cost-sharing option for TUPE transfers that would start the move in the right direction.

24. Worked example

25. This example uses a discount of 50% against an hourly rate.

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<tr>
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<td>2. Cost to FSA @50% discount</td>
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<td>3. Charge to FBO</td>
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<td>4. Direct cost of an inspector</td>
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<td>5. Cost to FBO of a PIA (estimated)</td>
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<tr>
<td>6. Allowance given by the FSA</td>
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<td></td>
<td></td>
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<tr>
<td>7. Saving by the FBO (3. minus 5.)</td>
<td>1.65</td>
</tr>
</tbody>
</table>
8. Saving by the FSA (2. minus 6.) | 3.65
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**Contracted PIA**

9. Cost of contract PIA | 20.00

10. Cost to FBO of a PIA (estimated) | 13.00

11. Allowance given by the FSA | 7.00

12. Saving by the FBO (3. minus 10.) | 1.65

**13. Saving by the FSA (2. minus 11.)** | 7.65

26. It is clear even from this broad example that there are significant savings to be made through a cost sharing option.

**Conclusion**

27. The British poultry industry continues its successful growth with 900.4 million broilers slaughtered in 2014 [Source: Defra], and annual UK sales of £6.9 billion. It is estimated to support a £3.6 billion gross value added contribution to the UK GDP through its direct, supply, and wage consumption impacts; meaning that £1 in every £480 of economic output in the UK is in some way dependent on the poultry industry. [Source: Oxford Economics]

28. By weight 47% of all the meat purchased in the UK is poultry, and from a consumer’s perspective poultry prices have only increased by 13% over the last seven years compared to 35% for food in general.

29. The British poultry industry is a dynamic and market driven sector that continues to grow independent of any support or subsidy. It is ludicrous to suggest that the charging system has in any way distorted the market.

30. This consultation remains wholly about the FSA’s inability to control its own costs, and its ongoing efforts to pass those on through unreasonable charges for a monopoly service that is not fit-for-purpose.

31. The only reasonable route here is **Option 1: Do Nothing**, until such time as the fundamental flaws in European legislation, and the UK implementation thereof, are corrected.
Dear Richard

Discount Charging Consultation: Request for Information

Having started considering the discount charging consultation I find I need some clarification and additional information, and I hope you can help.

I refer to the first part of the consultation document, up to and including paragraph 30. A core premise of the need for a new methodology, and hence the consultation, is the inherent problems (introduction), flaws (para 26), inequalities (para 26), in the current system and the distortions (paras 9, 15, 17, 22) they create in the market.

On the question of distortions, in two places (paras 15, 22) the term potentially distorts is used, which I think needs clarifying. In this consultation is the FSA asserting that the current system has distorted the market?

If yes then I would like to request access to the evidence you used to justify this claim. The FSA is claiming that change is needed on the basis of the current system distorting the market to the point of affecting competition. This is a very serious claim and one that has not been substantiated either in the consultation or during the sessions of the working group.

I would like to see any evidence that you have used to justify the claim in the consultation that the current charging system has distorted the market and affected competition.

As a starting point I would like to see the impact assessment undertaken before the introduction of the Maclean system in 2001, and then any documentation since that time that demonstrates that businesses suffered financial loss or hardship as a direct result of the charging system.

Additionally I would like to know the following. How many legal proceedings since 2001 has the FSA been subject to that challenged the imposition of market distortion by the introduction and continued use of the current charging system (both pre- and post- 2009)?
My next question is based on an assumption so please tell me if it a wrong one. I assume that in 2001 the Maclean system was believed to be fair and equitable by all stakeholders, both the competent authority and industry. What changed between 2001 and 2009 for the Maclean system to be widely considered (para 15) to be unfairly impacting the market?

My last request should be straightforward. I would like to see a year-on-year summary of the typical percentage change in (a) charges made to FBOs, and (b) hourly rates for MHLs and OVs; for the years 2000 to date.

I suspect that the changes in the industry since 2001 have in the main been the result of improvements in efficiency and technology, and the gap (cost of inspection per livestock unit) has grown between those willing to embrace change and those who have not. If the charging system really has had the dramatic impact you claim then I look forward to reviewing the evidence.

If it would help with your administration I would be willing to submit any of the above as an FoI request.

Yours sincerely,

Richard Griffiths
Director of Policy
13 April 2015

Dear Richard

Discount Charging Consultation: Request for Information

Thank you for your letter dated 17 March 2015 about which we have subsequently exchanged a number of emails.

Your request identified a number of issues, which I would summarise as follows:

1. Any evidence that the FSA has used to justify the claim in the consultation that the current charging system has distorted the market and affected competition. As a starting point you would like to see the impact assessment undertaken before the introduction of the Maclean system in 2001, and then any documentation since that time that demonstrates that businesses suffered financial loss or hardship as a direct result of the charging system.

2. How many legal proceedings since 2001 has the FSA been subject to that challenged the imposition of market distortion by the introduction and continued use of the current charging system (both pre- and post-2009).

3. What changed between 2001 and 2009 for the Maclean system to be widely considered (para 15) to be unfairly impacting the market?

4. A year-on-year summary of the typical percentage change in (a) charges made to FBOs, and (b) hourly rates for MHIs and OVs; for the years 2000 to date.

I will respond in the order in which you raised the questions.
**Point 1**

I think all members of the Steering Group on Meat Charging are agreed that the current discount system for meat official control charges is inherently flawed. I do not recall you or other Steering Group members challenging this. Premises of a similar size do receive discounts at widely varying levels. I have attached to this letter as Annex 1 a further copy of the scatter graph for slaughterhouses showing the distribution of discounts which demonstrates the distortion in the distribution.

Much of the text in the introductory parts of the consultation package is taken from the September 2014 report to the FSA Board from the Steering Group on Meat Charging. This applies to those sections of the text that you have highlighted in your letter. The wording of the report to the Board was agreed with Steering Group members, including you, at meetings and through correspondence. The final one of these meetings was on 25 July 2014 where the Steering Group reviewed the Board report paragraph by paragraph and agreed the final text prior to submission to the Board.

One of the reasons I reused text from the Board report is because it had been agreed with Steering Group members and so I hoped it would not be contentious with you and the other members.

You requested a copy of the impact assessment completed before the introduction of the Maclean charging system in 2001. At the outset I should say that this information from 2001 is outside of the FSA’s retention provisions. However, I have attached a copy of the impact assessment relating to Scotland. Impact assessments in 2001 were very different to their current format but if you read this one you will see that while it is for Scotland, and does contain some information specific to that country, it is very generic and I am certain the ones for England and Wales would have been very similar. If you are not satisfied with this I will continue trying to locate the other impact assessments but this is not guaranteed to produce copies. Please let me know what you would like me to do.

The documents which I believe show most clearly the differential impact of the current charging regime are the presentations and analysis produced by the FSA’s Analytics team for the Steering Group on Meat Charging. Owing to the size of the files I have only attached one presentation pack (dated 27 March 2014). The analysis for the do nothing option on slide seven shows the sector split which illustrates the differences in the allocation between sectors proportionate to the number of premises in each. In addition, slides eight and nine show the scatter distribution of the discounts. I do not recall anyone, when presented with the scatter plots of discounts, who has disputed that there is a distorted distribution. As you know the FSA has been using graphs similar to these to illustrate some of the inherent problems with the current
discount system for several years. We presented these graphs to the FSA Board at a briefing meeting in July 2012 (http://www.food.gov.uk/sites/default/files/multimedia/pdfs/board/meatcharging10jul12.pdf) and at the full FSA Board meeting in September 2012 (http://www.food.gov.uk/sites/default/files/multimedia/pdfs/board/fsa120904.pdf). We also presented the graphs to the Office of Fair Trading (OFT) at a meeting in 2012 and the OFT did consider the discounts to be a distortion of the market.

You have asked for any documentation since 2001 that demonstrates that businesses suffered financial loss or hardship as a direct result of the charging system. On a number of occasions the FSA has asked industry for evidence of the impact of charges for meat official controls but there has been very little if any response. The last occasion was in 2011 and the FSA received ten limited responses from FBOs. Nothing meaningful could be determined from these.

**Point 2**

There has been one set of legal proceedings challenging the FSA’s charging and discount system that was introduced in 2009 on the basis that it distorts the market. There were no legal challenges issued against the principles of the Maclean system which was introduced in 2001.

**Point 3**

In the first paragraph of the second page of your letter you ask “What changed between 2001 and 2009 for the Maclean system to be considered (para 15) to be unfairly impacting the market?” I do not think the FSA did present this argument in respect of Maclean. The Agency’s primary concerns about the Maclean system were its impact on the net cost of operations for the Agency and whether it was appropriate for the FSA to “subsidise” the meat industry. The net cost of operations on meat activity increased from £18.5m in 2001/02 (the first year of Maclean) to £33.3m by 2006/07.

It was a Ministerial decision in 2000 that the recommendations of the Maclean Taskforce should be implemented. As someone who has been employed by the MHS, and subsequently the FSA, since 1995 I think it is fair to say there were reservations within the Agency about the practical implications of Maclean charging from very soon after implementation. The Tierney report in 2007 included a well reasoned critique of the system. In chapter 10 it stated:

“10.39 The current charging arrangements for Official Controls do not satisfy many of these [charging] principles [of the FSA Board], particularly where plants pay fixed throughput
charges that are difficult to relate in any meaningful way to the real costs of the services provided. Throughput charges operate as though all plants were the same. They prevent the Agency from targeting any subsidy to those most in need and provide no financial incentive for businesses to improve efficiency, standards or levels of compliance. The result is that the charge to the plant for Official Controls on one bovine (or Livestock Unit) is the same, irrespective of whether the plant is excellent (and so needs less supervision) or high risk (and so requires more). For the plant operator, the charge will remain the same however much he improves his standards or efficiency.

10.40 Similarly, throughput rates cannot easily drive the delivery authority (currently the MHS) to be more efficient, as they provide no incentive for plant operators to challenge inefficiency – the plant operator will pay the same however many resources the MHS has in the plant. Equally, the MHS has found that operating the throughput charging system itself causes inefficiencies, as it is complex and costly to administer and results in invoices that operators find difficult to understand.”

Point 4

I have attached as Annex 2 to this letter a table of the year on year change in the FSA’s charge rates with the rates shown as monetary amounts and the change shown as a percentage.

I hope this information is what you were looking for and is of assistance to you. Let me know if you think I have missed anything. I will wait to hear from you about dates for a proposed meeting and as you know I have asked industry colleagues for their views on holding meetings to discuss the proposals during the consultation, after 7 May and before 31 May 2015.

Yours sincerely

Richard Collier
Head of Finance – Charging
Annex 1

Distribution of discounts for slaughterhouses under the current system

Baseline 2012/2013 distribution of discounts across the UK banded according to slaughterhouse usage of hours of FSA staff time (1st Quintile very small FBOs to 5th Quintile very large FBOs)
# Annex 2

## Change in FSA charge rates from 2000/01 to 2015/16

### Rates

| Rates         | From 1/5/00 | From 2/4/01 | From 1/4/02 | From 31/3/03 | From 7/6/04 | From 25/4/05 | From 29/5/06 | From 28/5/07 | From 31/3/08 | From 28/9/09 | From 29/3/10 | From 28/3/11 | From 1/4/13 | From 31/3/14 | From 30/3/15 | From 2000/01 | From 2001/02 | From 2002/03 | From 2003/04 | From 2004/05 | From 2005/06 | From 2006/07 | From 2007/08 | From 2008/09 | From 2009/10 | From 2010/11 | From 2011/12 | From 2012/13 | From 2013/14 | From 2014/15 | From 2015/16 |
|---------------|-------------|-------------|-------------|---------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| PMHI Normal Time | 13.59       | 14.00       | 14.60       | 15.60         | 17.30       | 18.10       | 20.80       | 22.50       | 30.70       | 32.40       | 30.70       | 32.40       | 29.20       | 28.80       | 28.50       | 29.30       | 29.60       | 20.80       | 22.50       | 30.70       | 32.40       | 30.70       | 32.40       | 29.20       | 28.80       | 28.50       | 29.30       | 29.60       |
| MHI Normal time | 14.85       | 15.30       | 16.00       | 17.00         | 18.90       | 19.80       | 20.80       | 22.50       | 30.70       | 32.40       | 30.70       | 32.40       | 29.20       | 28.80       | 28.50       | 29.30       | 29.60       | 20.80       | 22.50       | 30.70       | 32.40       | 30.70       | 32.40       | 29.20       | 28.80       | 28.50       | 29.30       | 29.60       |
| EOV Normal Time | 29.13       | 30.00       | 31.40       | 33.40         | 35.40       | 38.90       | 34.00       | 36.70       | 37.10       | 40.50       | 37.60       | 37.10       | 40.50       | 37.60       | 36.80       | 36.80       | 37.30       | 38.00       | 34.00       | 36.70       | 37.10       | 40.50       | 37.60       | 36.80       | 36.80       | 37.30       | 38.00       |
| COV Normal Time | 34.00       | 36.70       | 37.10       | 40.50         | 37.60       | 36.80       | 36.80       | 37.30       | 38.00       | 34.00       | 36.70       | 37.10       | 40.50       | 37.60       | 36.80       | 36.80       | 37.30       | 38.00       | 34.00       | 36.70       | 37.10       | 40.50       | 37.60       | 36.80       | 36.80       | 37.30       | 38.00       |

* There was no PMHI rate after 2006/07. After this year there has been one set of rates for all MHIs.

### Difference

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* There was no PMHI rate after 2006/07. After this year there has been one set of rates for all MHIs.

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Not at full cost