

# Consultation on Early Proposals for a Future Delivery Model for FSA-Delivered Official Controls in the Meat Sector

## Summary of stakeholder responses

**4 November 2021**

### Introduction

This consultation was issued on 28 May 2021 and closed on 23 July 2021.

The purpose of the consultation was to gather stakeholders' views on an early proposal for reform of FSA-delivered Official Controls in the meat sector, as part of our wider evidence gathering process.

The formulation of an outline Future Delivery Model (FDM) is the first stage of this reform activity and it is important that we work collaboratively with a wide range of stakeholders to help shape the future. We want to gain insight into how the proposals would affect consumers, industry, retailers, other parts of government and Local Authorities to gather feedback, suggestions and alternative proposals from interested parties before progressing further with this work. Once the aspects of the FDM have been designed in more detail, we will be holding further consultations on any options or recommendations prior to implementation.

The FSA is grateful to those stakeholders who responded and sets out in the tables below responses in order of the issues considered and groups responding.

The key proposals on which the consultation sought views were:

- An early proposal for the reform of FSA-delivered Official Controls in the meat sector, as part of a wider evidence gathering process. The key elements of the proposal on which views were sought are:

- Clearer Accountability - between industry and the regulator enabling more effective working together. In practice, industry taking more responsibility for daily inspection activities and the FSA, as regulator assuring this activity, with the aim of delivering increased levels of compliance.
- Tailored Presence – FSA presence tailored in line with the risk of individual premises / products with resources weighted more towards premises that pose a higher food safety risk, with some lower risk premises demonstrating systematic and long-term compliance being subject to lower levels of FSA presence than under the current model.
- Robust Assurance Regime – a robust and clear set of tools and techniques to ensure a high level of assurance across all stages of Official Controls delivery. A single, highly skilled and experienced FSA Assurance function will work with Food Business Operators (FBOs) remotely and onsite on a risk and intelligence-led basis, to raise standards, identify and share best practice and take the appropriate action in instances of non-compliance. Working with other assurance organisations and retailers to share data and intelligence to better target our assurance activities.
- Digitised ‘Real-Time’ Data by Default – the FSA and FBOs collecting data once, and using it multiple times for multiple purposes, either in a single system or via systems that can ‘speak’ to one another.
- Transparent Compliance – working with industry on how best to publish and share compliance information to encourage an overall increase in standards and to provide consumers with increased confidence.
- Modernised Management – a more streamlined management function with digitised capability to support efficient resource deployment.
- Resource Capability and Capacity – a more skilled and resilient workforce capable of undertaking a wide range of activities, flexing to changing business requirements and based on a resource delivery model designed to support our future ambitions.

## Summary of responses by stakeholder group

A summary account of responses by stakeholder group is provided below. More detailed comment on the individual elements of the FDM is included in the tables following this section. A list of stakeholders who responded can be found at the end of this document.

## **Consumers and consumer organisations**

Support for the proposals overall was mixed. The proposal for a risk-based approach allowing the allocation of resource to be focused on poorer compliance FBOs was largely supported.

Consumer views were gathered in a series of focus groups. Although the proposals presented to them for discussion were the same as those contained in the consultation document, consumers were not responding to the formal consultation on the same level of detail as other stakeholders mentioned in this report. Consumers expressed a range of views in relation to the benefits and the potential risks of the FDM. Those who believed that the FDM would maintain or improve standards felt comfortable with the proposals. They saw the potential benefits and described the measures they would like to see in place, for example, increased unannounced inspections and publicly available FBO performance scores, which could lead to greater compliance and improved standards. Consumers also expressed the importance of FSA maintaining its independence as a regulator.

Consumers saw that making greater use of technology and existing FSA resources by tailoring presence, and increasing data sharing with industry could lead to improvements. Many cautioned that it would be essential to take steps to ensure standards did not slip, including maintaining current levels of FSA presence in lower performing businesses and providing independent training to industry employees carrying out inspections in the future.

Some consumers were concerned about the impact of reduced FSA presence in some businesses. They were concerned about industry having responsibility for checking carcasses and felt that FBOs may not act in the consumers' best interest. They argued that the FDM could result in lower standards and wanted to maintain the current official controls process. They were concerned that the changes could put food safety at risk and worried about the implications to public health.

Consumer interest groups supported the risk based and tailored approach to ensuring compliance, enabling more resource to be applied to FBOs with poorer compliance, supported by transparency of information on compliance. Accordingly, transparent compliance was very much welcomed, provided the data on FBO compliance was made available to consumers to enable an informed choice when buying meat. There was also concern that tailored presence could create a “two-tier” system that gives different, and potentially weaker, protection to UK consumers compared to consumers in countries the UK exports to.

Across consumers and consumer groups, clearer accountability was cautiously supported but with concerns around potential for the FSA/FBO relationship becoming blurred. Concerns were also expressed that a consequence of industry having more responsibility could lead to potential conflicts of interest with commercial pressures, allowing profit to come before food standards and temptation to cut corners, compromising food safety.

Many also identified the benefits of the robust assurance regime to drive improvements in standards, but some concerns were raised over the resource implications and assurance sought that the FSA would maintain impartiality from assurance schemes / industry.

One group of consumers, who the FSA had approached to discuss the proposals declined the offer and created a petition to 'Stop the FDM'. The petition attracted a number of emails to the FSA. The majority of these were identical and did not engage with the specific proposals in the FDM consultation document. The group did submit a consultation response which focused on the concern that any reduction of independent Meat Hygiene Inspectors (MHIs) would lead to lower food safety standards. Concern was also raised in relation to industry “marking its own homework” and there is some perception that cost savings are the driver for these proposals. Concern was also raised over lowering UK import standards (for example, chlorinated chicken, hormone beef).

## **Industry and third party assurance organisations**

Industry response to the FDM proposals came from businesses, industry bodies and farmers' unions representing England, Wales, Northern Ireland and Scotland.

Responses were largely very supportive, welcoming change which was felt by some to be long overdue. However, many respondents felt that there was not enough detail in the proposals to comment fully and welcomed further information to inform definitive views, particularly on what the proposals would look like in practice.

There was strong support for the risk based approach, but with emphasis that this should be proportionate and assessed fairly in order to not disadvantage smaller FBOs. Industry was keen to enhance consumer trust and to see that any changes under the FDM would not have a negative impact in this area.

Clearer accountability, tailored presence and robust assurance were the most favoured proposals by industry and there was also strong support for improvements to data collection and usage across industry.

Several respondents suggested the FSA take the opportunity to incorporate measures to enhance animal health and welfare in shaping the FDM proposals. One example cited was to enable post mortem inspection (PMI) information to be fed back from the abattoir to the farm, to assist the producer with making improvements to animal health and welfare. Industry was very supportive of digitised real time data with improved collection and analysis of real time data with joined up compatible networks. However, also in relation to data, views were strongly expressed that the data the FSA uses for the risk assessments of FBOs must be accurate, consistent and robust in order to be fairly applied.

There was strong support for resource capability and capacity, particularly in relation to the recruitment and retention of OV's, with strong views in relation to urgently resolving Official Veterinarian (OV) resourcing. Industry also expressed that there is a need to improve the scope of the role, as well as general recruitment and retention of OV's. They were also supportive of the upskilling of MHIs.

Industry concern focused on the impact of future changes on EU and other country trade. The Northern Ireland Protocol, a "level playing field" for Northern Ireland industry and divergence of regulation between England and Wales with Scotland and Northern Ireland were also significant concerns. More detail was sought on how all of this would work in practice, especially for FBOs who supply both domestic and export markets. There were also very strong concerns over creating a "two-tier" system for domestic and export markets, although some industry respondents did support this in order to allow those only

supplying domestic markets to be able to take advantage of flexibilities. There were also concerns in relation to potential costs to business, particularly smaller FBOs, for example purchasing new technology and upskilling FBO employees.

Another area of strong concern for many industry respondents was in relation to the publication of compliance data to retailers and consumers. The majority felt that retailers could use this data to apply unfair competitive levers and that consumers' lack of understanding of compliance / audit data could lead to misconceptions, both of which could harm industry reputation and cause loss of business.

Third party assurance organisations, which set standards for food chain and animal welfare assurance schemes, were generally supportive of the proposals with their main concerns being in relation to animal health and welfare. It was proposed that animal health and welfare must be prioritised in decision making on any of the changes under the FDM. They were also keen to share experience and best practice in assurance to help shape the FSA assurance function.

## **Veterinary**

Veterinary respondents focused on animal health and welfare and were keen to see the OV resource used to ensure real time improvements in food safety and animal health and welfare both at the FBO and the farm, with better use of data. Again, more detail was sought on the proposals, in particular, the extent to which animal health and welfare improvements would be made, how the FSA will assure itself of the information being relied upon for decision making, and what the FSA is considering in terms of environmental impacts of the proposed changes.

The majority of responses focused on the recruitment and retention of OVs, supporting better remuneration for professional skills and expertise, and clear career pathways in order to make the role more attractive. It was suggested that any new delivery model must recognise the importance of the vet-led team with OVs leading on animal health and welfare.

Veterinary concerns focused on any reduction of the vital role of OVs in abattoirs being detrimental to animal health and welfare, public health and UK trade. There was strong opposition to the creation of a "two-tier" system for domestic and export markets and

concern that this has the potential to lead to reduced veterinary oversight. There was also concern in relation to trusting industry with more responsibility and the risks to food safety and animal health and welfare this may bring.

Responses also included reference to seeing clearer accountability extending to collaborative working with farms, as well as information being fed back to the farm from the OV to improve animal health and welfare practices with the producer. Additional animal health oversight for OVs would also make the role more attractive and improve recruitment and retention.

Tailored presence centred on animal health and welfare provisions and the complexities of moving to separate domestic / export markets, the impact on trade, the four country framework and other country relations.

## Internal

The main body of internal feedback came from FSA Field Operations colleagues. Improved technology to assist with daily duties was welcomed, along with the possibilities with upskilling of MHI duties and professionalism of the MHI and OV roles. More detail on the proposals was sought, particularly in relation to what the future roles and responsibilities for MHIs and OVs would look like.

Many expressed concern that the integral role of MHIs (to prevent incidents and protect public health, identify and break parasite life cycles, identify pathology and ensure the health of animals and protect their welfare) could be lost with a reduction in levels of FSA inspection. There was significant concern with clearer accountability and tailored presence, with industry having more responsibility leading to cutting corners even in highly compliant plants and the risks to food safety and animal health and welfare this poses. Many expressed a belief that current levels of high standards in FBOs is because of the FSA's independent, full time presence.

Many are concerned about their job security. There was also concern about the FSA's current reputation for high standards being compromised and some concern was also raised in relation to differences between England and Wales with Scotland and Northern Ireland.

## Local Authorities

Responses were received from local authorities in England and Wales, including a response from the DPPW (Department for Public Protection Wales) on behalf of the 22 Welsh local authorities. Local authority responses were high level and indicated that more detail on the proposals would have been desirable, including evidence and research used to inform the case for change. Their responses sought further clarity as to how the proposals would impact Scotland and Northern Ireland in the context of the four-country framework. They would have liked to have seen more consideration of the potential impacts of the proposals on public health.

Local authorities, as co-regulators of the meat sector, with responsibility for delivering food standards official controls at FSA approved establishments, sought further engagement from the FSA to assist in developing the proposals to change delivery arrangements ensuring that potential impacts on Local Authorities are also considered.

The current issues in relation to developing a more sustainable workforce were raised and identified as an area of priority work for the programme, to ensure that official controls in the meat sector are appropriately delivered with public health objectives being met.

## Other interested parties

Views among other interested parties across England, Wales, Northern Ireland and Scotland, comprising specific interest groups and engagement with other government departments and devolved administrations were mixed. More detail was sought on the FDM proposals with supporting contextual information, how third party auditors (which set standards for food chain and animal welfare assurance schemes) would have their competency assessed, and how the proposals align with the National Food Strategy, the UK Government's net zero carbon emissions target and risks in relation to zoonoses.

There was recognition of the strong links between animal welfare with animal health and food safety and the FDM being an opportunity to increase compliance and animal welfare practices.



Strong concern was expressed in relation to England and Wales divergence with Scotland and Northern Ireland.

There was focus on the robustness of data for assessing FBO risk, checks and balances for clearer accountability, the benefits of tailored presence and the better use of FSA resources but concern over lowering standards in FBOs. There was strong support for transparent compliance.

The Food Standards Agency's considered responses to stakeholders' comments on the seven elements of the FDM are given in the last column of the tables below.

## Summary of substantive comments by Future Delivery Model Element

### Clearer Accountability

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>Industry largely welcomes Clearer Accountability, but a number of concerns were raised and more detail was sought.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"><li>• Industry taking more responsibility for ensuring compliance is likely to make the majority of FBOs strive to ensure effective implementation of and compliance with requirements.</li><li>• Increased levels of earned autonomy welcomed, with more FSA focus being placed on those FBOs which pose a significant risk to the public.</li><li>• An open and trusting working partnership between the FBO and FSA is important for consumer trust. It is also vital to resolve issues, with enforcement as a last resort.</li></ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"><li>• There is a need for effective checks and balances for the FSA to identify poor compliance.</li><li>• Effective processes are needed to gather and analyse data, as well as action plans for correction, or sanction, to address poor compliance.</li></ul>	<p>We note these suggestions and will consider them in shaping the further detail of the proposals.</p> <p>The further detail sought here will be clearer once further investigation and development work has progressed for this element of the FDM. As the proposals develop, further detail will be shared with key stakeholders as part of ongoing engagement.</p> <p>We are very mindful of impacts on industry and the importance of not disadvantaging a particular sector of industry.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Industry believe that FSA needs to build a culture of trust for the success of this.</li> <li>• Emphasise 'proportionate' in relation to 'risk based approach'.</li> <li>• PMI information being fed back to primary producers would benefit them, to improve overall standards.</li> <li>• The FBO/FSA relationship should encourage FBOs to contact FSA for support and guidance. Discussing issues early with the FBO could lead to less enforcement action, saving time and taxpayers' money.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>• How the FSA intends to progress and 'measure' the progress of clearer accountability along with information of who (the type of organisation, which sectors etc) would be included in the initiatives.</li> <li>• How the risk based approach relates to food wholesomeness (removal of pathologies that aren't unsafe but affect meat quality).</li> <li>• What inspections will look like / attendance levels of MHIs and OVs.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Moving away from enforcement to a system with less official oversight.</li> <li>• Industry being given sufficient time to adapt, and with correct support in place especially for smaller FBOs.</li> <li>• Increased costs for FBOs taking on daily inspection.</li> </ul>	

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Changes will increase cost to <i>producers</i>, who won't gain anything from clearer accountability.</li> <li>• Other countries could perceive this as a lower tier inspection system.</li> <li>• The FSA must demonstrate that delegating responsibility for compliance to industry is effective and 'safe' in practice, to give stakeholders confidence that it is appropriate.</li> </ul>	
Consumer & Consumer Organisations	<p>Consumer reaction to Clearer Accountability was cautiously supported.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• Clarity on FSA's role in settling standards and clear guidance for FBOs.</li> <li>• Data from FBOs should help the FSA identify problems early and to deal with them quickly and easily.</li> <li>• More efficient use of FSA resources to support non compliant FBOs.</li> <li>• FBOs taking greater pride and responsibility could increase standards.</li> <li>• Technology could reduce human error, improving accuracy of checks.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• FBO engagement will be important in determining appropriate data for FSA's assurance function.</li> </ul>	<p>We note these suggestions and concerns and will consider them in shaping the further detail of the proposals.</p> <p>It is, and will remain, the FBO's legal responsibility to produce safe meat. Under the new model, the FSA will remain an effective, independent regulator. A flexible partnership with industry will not compromise our overriding function to protect consumers and ensure safe food.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Consumers would feel more assured if, for example, regular spot-checks and unannounced inspections assess whether FBOs are following correct procedures.</li> <li>• An FSA-led or independent training programme with formal qualifications for industry employees to conduct carcase inspections.</li> <li>• Strong penalties for errors by FBOs / employees, for example fines, prosecution.</li> <li>• Human supervision for new technologies and processes to ensure accuracy would assure consumers.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>• What evidence there is to suggest increased levels of compliance will occur if this proposal is implemented.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Blurring of responsibilities under the 'flexible partnership' between industry and the FSA. The FSA's role as regulator and primary purpose of consumer protection could be compromised.</li> <li>• Conflict of interest if FBOs check carcasses. Potential reduction in standards affecting food safety.</li> <li>• Financial impact for small FBOs and whether they could fund the additional training required.</li> </ul>	

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>Industry “marking its own homework” contributed to the BSE incident and concern that the FSA is asking industry to do this again with industry carrying out their own inspections.</li> </ul>	
Veterinary	<b>Suggestion:</b> <ul style="list-style-type: none"> <li>Collaborative working should include farms/producers.</li> </ul>	We welcome this suggestion and will consider it in shaping this element of the future model.
Local Authorities	<b>More Detail Sought on:</b> <ul style="list-style-type: none"> <li>How monitoring and verification checks will be carried out.</li> <li>Rewards to compliant businesses.</li> <li>The measures that FSA will take to deal with non-compliance.</li> <li>Impacts of this element on public health.</li> </ul>	The detail sought here will be developed as work progresses on this element, with further engagement with local authorities.
Internal	<p>Internal feedback focused on concern over FBO impartiality and trusting industry to ‘do the right thing’.</p> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>Trusting industry with data recording.</li> <li>Commercial influence in rejecting carcasses.</li> <li>FBO impartiality. A sampling officer is still required.</li> </ul>	We note and understand these concerns and will continue to work with internal colleagues on shaping the detail of the future model.
Other interested parties	<p>Feedback from remaining stakeholders focused on the checks and balances for Clearer Accountability:-</p> <p><b>Suggestions:</b></p>	The future model will not compromise the FSA’s independence or standards as a world-class regulator. Consumer trust and

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>Need safeguards to ensure FSA's independence is not compromised.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>How non-compliance will be dealt with.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>If auditing becomes less frequent, how the FSA guarantees that food safety standards are being implemented. The risk that FBOs see a daily opportunity to let standards slip and only meet standards when the FSA visits. Unhygienic conditions are a breeding ground for zoonotic disease and pose a great food safety risk.</li> </ul>	<p>food safety are at the heart of everything we do. FBOs will remain under a legal duty to produce safe meat, as they are currently.</p>

## Tailored Presence

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>Industry was generally very supportive of Tailored Presence but some had concerns over trade impacts and potential creation of a “two-tier” system for domestic and export markets.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>This element has potential to drive performance.</li> <li>Support for appropriate presence that would promote economic growth and best utilise FSA resources.</li> </ul>	<p>We note the suggestions and will consider these in further shaping the detail of this element of the future model.</p> <p>We understand the complexities in relation to implementing a dual system for the export and domestic market, and in relation</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• This could allow better use of OV time and reduce FBO costs, and better collaboration between FSA/FBOs on emerging issues.</li> <li>• Support the intention to potentially reduce OV presence in highly compliant plants.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Would like an appropriate reduction in audit frequency.</li> <li>• Increased consumer confidence in using standard, comparable, transparent and easy to understand compliance data.</li> <li>• CCTV could provide remote ante mortem inspections and permit cold PMI, reducing presence of OV, particularly in small FBOs.</li> <li>• This proposal could free up OV time: i) to conduct work other than Official Controls in those FBOs where additional work is required (for example EHCs), ii) to cover multiple FBOs where only Official Controls are required.</li> <li>• The robustness and reliability of the risk assessment, intervention thresholds set, and the nature of the response when thresholds are exceeded are key to success.</li> <li>• Maximise the use of well-trained meat technicians to support and undertake meat inspection where appropriate.</li> <li>• Low and medium throughput abattoirs provide a range of alternative services and marketing options, and smaller poultry plants play an</li> </ul>	<p>to exports, and the GB-NI domestic market. This is a very large body of work for the programme, involving input from and engagement with devolved administrations, other government departments, particularly those related to international trade and animal health and welfare, trading partners, including the EU, industry and the veterinary community.</p>



Respondent	Comment	Response
	<p>important role in export of premium British poultry. The FDM must take account of financial viability of these and seek to reduce the overall burden and costs of regulation for smaller FBOs.</p> <ul style="list-style-type: none"> <li>• The FSA and the UK Government need to engage early with trading partners as some may not embrace the new approach.</li> <li>• The numbers of animals processed as well as experience and training should be a strong element of the risk assessment.</li> <li>• There should be a baseline suite of Official Controls for all FBOs with additional resource deployed to i) FBOs at risk of/with history of non-compliance; ii) FBOs producing high risk products; iii) FBOs producing product subject to external factors, for example, third country trade regulations.</li> <li>• The legal process for dealing with non-compliance is not an incentive. Legislative change is needed to improve enforcement. Explore fixed penalty notices that are effective in other countries.</li> <li>• This element should be supported by unannounced inspection to all/any premises regardless of compliance record. Previous records are an indicator of current/future performance, but not a guarantee.</li> <li>• Inspections and compliance must be considered separately.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>• The implementation of this in practice, and potential impacts.</li> </ul>	

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• The segmentation/risk assessment.</li> <li>• How producer assurance schemes will influence future inspection levels by the FSA and the checks and balances on the information used for risk assessments.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Need one system to cover domestic and export markets as parts of one animal can go to different markets. Separate regimes might also give other countries perception of a decrease in UK protections.</li> <li>• A “2-tier” system could: <ul style="list-style-type: none"> <li>- Financially disadvantage FBOs that export.</li> <li>- Not enable exporting FBOs to benefit from the change due to the commitment with trading partners being based on full time presence of officials.</li> <li>- Disadvantage Northern Ireland FBOs and favour UK ones – potential increased checks on all trade to ensure imports are coming from ‘EU approved’ premises. NI FBOs will not be able to take advantage of FDM flexibilities.</li> <li>- Distort the UK domestic market with higher costs in moving product to NI and disadvantaging NI FBOs. This will impact the competitiveness of red meat FBOs.</li> </ul> </li> </ul>	

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>- Be perceived as lowering standards, leading some trading partners to de-list British processors if they believe food safety is compromised, resulting in the loss of valuable export markets.</li> <li>• Some support for different regimes for UK/export markets, provided no compromise to current exports or future trade deals.</li> <li>• FBOs exporting to specific markets may seek to maintain a higher level of oversight which would be based on their business needs.</li> <li>• Small FBOs may not be equipped to maintain standards under the FDM, so need to ensure the overall industry standard doesn't fall.</li> <li>• Loss of detection of physical changes indicating microbiological / parasitical infection.</li> <li>• The level of training of FBO staff for meat inspection.</li> <li>• Level of trust in industry to carry out inspections given past incidents.</li> <li>• The link between food safety and animal welfare is not always recognised. Prioritisation of resources on food safety may detract from resources available to assess/address animal welfare issues.</li> </ul>	
Consumer & Consumer Organisations	<p>Consumers responded cautiously to Tailored Presence, but many saw the benefits of enabling more resource to be applied to FBOs with poorer compliance.</p> <p><b>Support For / Positive Views:</b></p>	<p>We note the suggestions and concerns of consumers and consumer organisations on this element. Consumer trust and food safety remain our highest priority and the new model will not compromise our</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Greater support for non-compliant FBOs could increase standards and better use of FSA resources.</li> <li>• Multiple site FSA officials could improve knowledge sharing and capture good practice.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• The FDM should adequately reflect risks posed by different types of FBO and ensure failings in compliance are quickly dealt with.</li> <li>• Outcome focused regulation may work for some FBOs but be a challenge for others with more limited understanding of the risks or facing difficult commercial pressures.</li> <li>• This approach should be trialled before being implemented, to ensure no reduction in standards.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Moving to tailored presence must not expose consumers while official checks are removed and FBOs working in a high pressure environment take on new responsibilities.</li> <li>• Reduced MHI presence could lead to FBO complacency, standards reducing, loss of MHI knowledge and MHIs too thinly spread.</li> <li>• Lowering of standards and UK food no longer being trusted, leading to increased imports affecting our balance of trade and more food illness outbreaks as food is sourced from less reliable sources.</li> </ul>	<p>independence or standards as a world-class regulator. FBOs will continue to be legally responsible for producing safe meat. We will consider these in further developing this proposal.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>It could become difficult for MHIs to influence FBOs if they are not there full time.</li> <li>Private companies carrying out meat inspections have to make a profit. Concern over how well these inspections will be carried out.</li> </ul>	
Veterinary	<p>The veterinary community views centred on animal health and welfare and concern over different systems for UK and domestic markets.</p> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>Animal welfare should be factored into the FBO risk assessment.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>How the FSA will respond promptly when an FBO's risk increases.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>Low throughput and single-species FBOs have value and animal welfare advantages, but there is variability in animal welfare.</li> <li>Strong concern over creating a dual system for domestic and export markets, with potential to lead to reduced veterinary oversight.</li> </ul>	<p>We understand the complexities in relation to implementing a dual system for the export and domestic market, and in relation to exports, and the GB-NI domestic market. This is a very large body of work for the programme, involving input from and engagement with devolved administrations, other government departments, particularly those related to international trade and animal health and welfare, trading partners, including the EU, industry and the veterinary community.</p>
Local Authorities	<p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>Local Authorities have sought more detail on how tailored presence would impact on public health.</li> </ul>	<p>As work develops on shaping this proposal, we will further engage and share this information with local authorities.</p>
Internal	<p>Internal feedback focused on the value of the role of MHIs and concerns over a reduction in presence leading to lower food safety standards.</p>	<p>We note these concerns and will continue to work with internal colleagues on shaping</p>

Respondent	Comment	Response
	<p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• A reduction of MHIs in FBOs may increase near misses / injuries.</li> <li>• Less independent inspection may lead to cutting corners, even in highly compliant plants. Independent MHIs are an important control point for early identification of problems such as Foot and Mouth which may impact public health, and animal health and welfare.</li> </ul>	<p>the detail of the future model. FBOs are legally responsible for producing safe meat and this will remain the case under the new model.</p>
Other interested parties	<p>Other comments included the benefits of better use of FSA resources but concern over lowering of standards in FBOs.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• Targeting higher risk FBOs could allow the action of more robust improvements to higher food safety risk premises.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Low risk FBOs may lower standards if they are not being so heavily scrutinised by the FSA.</li> <li>• Perceived relaxation of FSA checks eroding consumer confidence.</li> </ul>	<p>We note the concerns and will consider them in shaping the detail of this element. FBOs will continue to have legal responsibility for producing safe meat.</p>

## Robust Assurance Regime

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>Industry largely very supportive and see the benefits of the robust assurance regime, provided the data used is robust. There were some concerns relating to data sharing and some limitations of auditing.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• Welcome reference to earned recognition from existing assurance.</li> <li>• Welcome end-to-end assurance regime leading to better compliance, greater intelligence, enabling identification and sharing of best practice and increasing existing skills and capacity of the FSA.</li> <li>• Reduced inspection levels for FBOs adopting 3rd party assurance, using technology and sharing data demonstrating high compliance.</li> <li>• Robust assurance is important for consumer trust, food safety and animal health and welfare standards.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Level of FSA audits in highly compliant premises could be reduced, allowing FSA to focus on poorer performing sites.</li> <li>• Assurance scheme audits must be harmonised for consistency.</li> <li>• Need to get the right balance of onsite / offsite assurance functions – this could save time and resource for FBOs and FSA.</li> <li>• Third party assurance schemes are rarely used by smaller operators.</li> </ul>	<p>We note the suggestions and will consider these in further work on developing this element. As work progresses, we will gain the further detail sought, which we will share with stakeholders through ongoing engagement.</p> <p>We note the concerns raised and will take these into account in shaping this element. We are mindful of wide ranging impacts if data is not robust and we will establish how best to ensure robust data.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Need to manage duplication of activities where standards overlap with existing assurance regimes.</li> <li>• Inspection should provide accurate information for producers to make a difference at farm level. Contributing more to animal health would increase interest in the OV role.</li> <li>• The robustness and qualifying requirement with third party data should be addressed, to maintain FSA's total independence in the consumer's eyes.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>• How enhanced activity will be charged to industry.</li> <li>• How working with third party assurance schemes will influence FSA inspection levels.</li> <li>• The use of remote auditing.</li> <li>• How the benefits would be achieved in practice and the potential for animal welfare improvements.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• CCTV can support OV inspection but not replace it. There are many examples of welfare breaches despite CCTV being in place.</li> </ul>	



Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Potential inappropriate use by sharing data with 3rd parties - regulatory actions taken against an FBO being wrongly / unfairly used in commercial negotiations between producers and retailers.</li> <li>• Auditing is important to delivering Official Controls, but it should be for checking compliance with regulatory requirements. 'Enforcement' suggests artificial raising of standards and gold plating.</li> <li>• There is still a need for an individual to monitor animals arriving at the abattoir to identify poor welfare.</li> <li>• The use of assurance data from external sources has potential to enhance the FSA's knowledge and understanding of ongoing performance of FBOs. There must be in place appropriate criteria against which to justify the robustness of the data in question.</li> <li>• Assurance schemes vary significantly in the nature, quality and consistency of data collection / analysis. A system to assess this is needed to ensure credibility, quality, fairness and confidence.</li> </ul>	
Consumer & Consumer Organisations	<p>Many benefits were identified by consumers/consumer group stakeholders to drive improvements in standards. Concerns focused on resources and impartiality between the FSA and assurance schemes.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• Enhanced collaboration and data sharing could improve chances of identifying when things go wrong.</li> </ul>	We welcome the suggestions made and will consider these, along with concerns raised in developing this element.

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Transparency about FBOs could increase consumer confidence.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• A highly skilled, experienced FSA function will be needed to work remotely and on site. FSA should share data and intelligence with other organisations but be clear about respective roles e.g. where 3rd party assurance bodies are paid for and accountable to the FBO.</li> <li>• FSA data could equip smaller supermarkets and businesses with information if they don't have existing assurance processes in place.</li> <li>• Potential to use technology such as cameras.</li> <li>• The assurance regime should cover all stages of food production.</li> </ul> <p><b>More Detail Sought On:</b></p> <ul style="list-style-type: none"> <li>• How aggregate scores would be agreed.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Assurance only works with rigorous checking and testing. Random sampling misses a high percentage of risk.</li> <li>• Organisations influencing FSA's standards.</li> <li>• Risk of issues being missed with poor / disjointed communication between different sources of information.</li> </ul>	

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>FSA must remain independent and have the final say on designing the assurance regime and deciding on any ratings.</li> <li>Leaving some inspections for 3 years / using alternative measures and computer data, rather than highly trained professionals carrying out independent inspections.</li> </ul>	
Veterinary	<p>Support the principles but more detail sought.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>FSA working with other assurance organisations and retailers to share data and intelligence to better target assurance.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>Work on how robust assurance will optimise the skills and experience of OV's while ensuring veterinary oversight remains at the core of animal welfare and public health outcomes.</li> </ul>	We welcome the suggestion, which will be considered by the workstream that is developing OV resourcing.
Local Authorities	<p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>How the FSA will determine and monitor the competency of 3<sup>rd</sup> party assurance providers.</li> <li>The FSA must put effective measures in place to ensure that assurance providers are competent and credible, which will have an impact on the cost of the proposals.</li> <li>Audits are not as thorough as inspection at identifying food safety concerns - conversations and observations versus tick box exercise.</li> </ul>	We note these concerns, which will be considered as this element is developed further.

Respondent	Comment	Response
Other interested parties	<p>Feedback centred on concerns about the process and standards.</p> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Compliance levels dropping with reduced FSA presence and reliance on available resources to mitigate this with robust assurance.</li> <li>• Drastically different levels of animal welfare standards between assurance schemes.</li> <li>• Imports from third countries encouraging farmers to undercut cheap imports by lowering standards with reduced FSA presence.</li> <li>• Question the appropriateness of assurance schemes helping the FSA create an assurance regime. All FSA resources and time must be directed at ensuring UK standards don't fall.</li> </ul>	<p>We note the suggestion and concerns which will be considered as this element is developed further.</p>

## Transparent Compliance

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>There was some support for transparent compliance within industry but significant concerns over the misuse / misunderstanding of published data by retailers, media and consumers.</p> <p><b>Support For / Positive Views:</b></p>	<p>We welcome these suggestions which we will consider in shaping this element.</p> <p>We understand the concerns raised, particularly in relation to potential to</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>Standards must be transparent and audit / inspection results published for public confidence.</li> <li>Robust, evidence based objective information about FBOs practices and regulatory compliance would improve understanding and where information is positive, greater reassurance to all stakeholders.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>Industry must be consulted on detail of data sharing / publication.</li> <li>Data must be suitably presented and participants must endorse the scheme. It is crucial to avoid it being taken out of context and potentially damaging meat industry reputation.</li> <li>Compliance data could be shared with FBOs as benchmarking, but non-compliance data should only be shared with FBOs producing similar products.</li> <li>Careful consideration and agreement needed on what data is published to prevent misinterpretation and harm to trade.</li> <li>Consistency of MHIs /OVs is key to not lead to negative consequences / competitive disadvantage.</li> <li>Data can be better used throughout the supply chain. There is good opportunity for added value bolt-on projects to existing systems.</li> <li>Data sharing and collaborative approach should support dissemination of innovation and progression across the industry.</li> </ul>	<p>misconstrue data. We will continue to work with industry, including further consultation on this element.</p>

Respondent	Comment	Response
	<p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• Strongly oppose publicising data due to likely misunderstanding / misinterpretation. Consumers are not aware of nuances and context of audit data. This carries reputational risk for the whole industry.</li> <li>• Issues with consistency across the nation and the league table this will create will have negative impact on the supply chain as retailers and other supply chains could use data to gain competitive advantage over their rivals.</li> <li>• This could only be supported if publication merely reported compliance or non compliance.</li> </ul>	
Consumer & Consumer Organisations	<p>Consumers strongly supported transparent compliance, enabling informed decisions on the meat they buy, but there were concerns.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• Consumers want traceability, to know what hygiene standards had been met, and how animals had been treated.</li> <li>• Greater transparency could increase compliance and result in improved standards as FBOs want to protect their reputation.</li> <li>• This could result in poor performing FBOs leaving the market, thus increasing standards across the industry in the long term.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Inspections must be quality assured and independent.</li> </ul>	<p>We welcome the suggestions and note concerns raised. We will consider these in shaping this element and continue to engage with consumer groups and consumers in relation to this work.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• The information must be presented clearly, with information on what standards mean to avoid creating anxieties or misinterpretation.</li> <li>• Information could be updated on a regular basis enabling consumer choices based on recent performance.</li> <li>• Ratings should include hygiene and animal welfare standards.</li> <li>• Information should be online (rather than on packaging).</li> <li>• Restaurants and institutions like schools should also provide information about where meat they buy has been processed.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>• FBOs could lose contracts or close if fewer customers buy products.</li> <li>• Could be unfair to FBOs if recent improvements are not reflected.</li> <li>• This could lead to unequal access to quality meat and lead to more food waste if higher performing meat becomes more expensive.</li> </ul>	
Veterinary	<p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• Sharing data with retailers and consumers.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Type and frequency of information sharing needs careful consideration to avoid misunderstanding.</li> </ul>	We note the suggestion.

Respondent	Comment	Response
Other interested parties	<p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>Publishing compliance data is critical to allow customers to make informed choice on the meat they buy.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>Compliance data could include animal welfare, zoonotic risk, method of transport and slaughter. This may address concerns about FBOs reducing standards with reduced FSA presence.</li> <li>More transparent labelling could be incorporated through the FDM.</li> </ul>	We note the suggestions and will consider these in shaping this element.

## Digitised 'Real Time' Data by Default

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>Industry was very supportive of the collection and analysis of accurate real-time data, with joined up, compatible networks. Some concerns over funding, especially for smaller and medium FBOs.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>Greater use of data and technology should be adopted across the sector, allowing more flexible targeted inspection.</li> </ul>	We note and welcome the suggestions and concerns, which we will consider in further work on shaping this element.



Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Data should go back to the producer from the OV. Producers having better access to data that is relevant to the productivity and health of their animals allows them to make improvements of benefit to their animals and the environment.</li> <li>• This enables scope to consider remote inspection, overseeing process on a continuous real time basis for smaller FBOs. It's a practical way of providing flexibility and saving resource and could increase consumer confidence in the level of consumer protection.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Only collect data that is going to be used.</li> <li>• FSA databases to work alongside existing systems would be great advantage.</li> <li>• All FBOs should receive correct support and training.</li> <li>• Technology must work with partners to allow input and extraction of data to monitor and improve compliance. Real time data from FBOs should be captured to improve ability to reduce risk from non-visible sources of infection and establish a clear inspection and assurance pathway from farm to fork.</li> <li>• A single IT solution and central national database should be used throughout, ensuring consistency, ease of maintenance and data</li> </ul>	

Respondent	Comment	Response
	<p>extraction and integrity. This does not currently exist - who pays for such a system.</p> <ul style="list-style-type: none"> <li>Artificial intelligence may improve outcomes on modern, high speed lines, measuring bacterial load and delivering accurate traceability.</li> </ul> <p><b>Concerns / Opposition</b></p> <ul style="list-style-type: none"> <li>FBOs may be unable to afford, or reluctant to buy new IT systems when heavily invested in current ones.</li> <li>Ongoing recording of data over many years doesn't suggest this has been fed through to an improvement in animal health.</li> <li>Technology won't find all breaches.</li> </ul>	
Consumer & Consumer Organisations	<p>Consumer interest feedback was positive about using joined up networks, with some caution.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>FSA having better understanding of compliance and ensuring any problems are quickly rectified is a great improvement. It will help assess emerging trends and new risks.</li> </ul> <p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>Must be realistic about when this can be put in place by FSA.</li> <li>Caution is needed over the extent to which this can be a key pillar of the new model until these systems can confidently deliver.</li> </ul>	We note the concern and will consider this in developing this element.

Respondent	Comment	Response
Veterinary	<p>Veterinary feedback provided suggestions for the use of data.</p> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• FBOs and FSA should collect data to be used meaningfully, improve animal health and welfare, ensure compliance and food safety.</li> <li>• This data could be fed back to farm vet practice, transporter and producer to improve practices. Could reduce potential for zoonoses.</li> <li>• Influencing animal welfare at farm level could attract more OV's.</li> <li>• FBO data also has key role to play in surveillance.</li> </ul>	<p>We welcome these suggestions and will consider these in further developing this element.</p>
Internal	<p>Internal feedback comprised suggestions for systems and concern in relation to data accuracy, consistency and FBO actions affecting these.</p> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Data being assessed for FBO compliance must be accurate and interpreted consistently in every plant, supported by training, latest IT and standard operating procedures.</li> <li>• Removal of pathologies prior to MHI inspection (i.e. not seen, not recorded) needs addressing before facts / statistics are analysed.</li> <li>• New IT should be fit to use in all conditions, from lairage to chiller.</li> <li>• Consider using smartphones to capture evidence, immediately uploaded, time stamped and dated.</li> </ul> <p><b>Concerns / Opposition:</b></p>	<p>We welcome these suggestions and will continue to work with internal colleagues on shaping the detail of this element.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>Data loss with smaller FBOs - difficulties with IT and connections.</li> </ul>	
Other	<p><b>Concerns / Opposition:</b></p> <ul style="list-style-type: none"> <li>Process for collecting and storing data must be robust. Manual data capture is not reliable.</li> <li>An efficient system (or set of connected systems) are needed to guarantee the soundness of compliance data gathered, which would prevent transparent compliance data being published.</li> </ul>	We note these concerns and will consider them in further work on this element.

## Modernised Management

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>Although more detail was sought on Modernised Management, the principle was welcomed by industry.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>There is flexibility and efficiency for FSA and benefit on the wider supply chain.</li> <li>This will help improve management of resource deployment, greater flexibility for incident response and enhanced ability to meet demand more quickly and could help to protect animal welfare.</li> </ul> <p><b>Suggestions:</b></p>	This suggestion will be taken into account in developing this element.

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>Fewer overhead costs as a result of more efficient model should be taken into account in charges of the FSA.</li> </ul>	
Consumer & Consumer Organisations	<b>Concerns / Opposition:</b> <ul style="list-style-type: none"> <li>This will require significant changes and consumers must not put at risk as a new approach is developed.</li> </ul>	We note this concern.
Veterinary	<b>Support For / Positive Views:</b> <ul style="list-style-type: none"> <li>This is an opportunity to deploy OVs to work utilising their expertise and training and adds value, in the process increasing job satisfaction and retention.</li> </ul>	

## Resource Capability and Capacity

Respondent	Comment	Response
Industry & Third Party Assurance Organisations	<p>Industry strongly supported Resource Capability and Capacity, particularly in relation to the recruitment and retention of vets.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>Having a system in place for regular upskilling to ensure understanding of new developments and rules, and competency assessment will be vital if stakeholders are to feel reassured.</li> </ul>	We welcome these suggestions and will take them into account in further developing this element.

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Quality control across equivalent posts would ensure work is effective and consistent across all areas and premises.</li> <li>• The OV role must be made more attractive to UK vet graduates and ensure talents of MRCVS are fully utilised and add value.</li> <li>• Upskilling workforce, including OVs, MHIs and management will help increase standards of OVs and help retention and recruitment.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Changes to roles and responsibilities should be made slowly and ensure they don't significantly increase costs for FSA.</li> <li>• Collaborate with vet schools to improve / promote the OV role.</li> <li>• If FSA had more than one SDP, full service would be slowed by decision making, communication and complex resource allocation.</li> <li>• England and Wales' requirements are significantly larger / more complex than Scotland where FSS have a more in-house approach.</li> <li>• FSA should work with the veterinary community to ensure veterinary standards continue, enabling overseas vets to work in the UK.</li> <li>• Delegation of OV's routine and non-value adding tasks to non-MRCVS, meaning possibly fewer OVs but each with greater authority, clearly defined remit and authority set out in statute. This may increase MHIs or enhance their role into 'veterinary technician' who supports the OV in their work, e.g. reviewing CCTV, online PMI.</li> </ul>	

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• OVs should have greater variety of work opportunities, professional responsibility and power of decision, have interesting career path and be remunerated on a par with fellow professionals.</li> <li>• A reduction of OVs with enhanced remit would reduce resource pressures, attrition and be more attractive to graduates. An apprenticeship scheme could be developed to suit this idea.</li> <li>• Area and regional managers works well. The role of SDP should be reconsidered. Bringing OVs in house would bring great benefits and go a long way to improving relationships with FBOs.</li> </ul>	
Consumer & Consumer Organisations	<b>Support For / Positive Views:</b> <ul style="list-style-type: none"> <li>• Crucial that a sustainable workforce is in place to support the FDM.</li> <li>• A long term solution is needed for OV resource issues.</li> </ul>	
Veterinary	<p>Veterinary feedback was strongly supportive of reviewing roles and responsibilities for OVs, and improving recruitment and retention.</p> <p><b>Support For / Positive Views:</b></p> <ul style="list-style-type: none"> <li>• OVs are highly trained with multi-species knowledge and have an essential role in public health.</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• The vital presence of OVs in abattoirs is undervalued. FBO/OV engagement would enable FBOs to see OV value and expertise.</li> </ul>	<p>We welcome these suggestions, which will be considered by the workstream developing the OV resourcing work.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> <li>• Influencing animal health and welfare is important for many OVs' job satisfaction. Working at farm level as well as abattoir could bring improved animal health and welfare and job satisfaction.</li> <li>• Fair remuneration reflecting skills and expertise, and clear attractive, and attainable career pathways are important for retention.</li> <li>• The FSS demonstrates the benefits of moving away from an SDP to in house resource.</li> </ul>	
Internal	<p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Trained MHIs could assist enforcement, working with the OV and unannounced inspector, allowing the OV to monitor multiple plants.</li> <li>• An apprenticeship could improve recruitment and retention of MHIs.</li> <li>• MHIs could be expanded into other areas such as other government departments, cold stores.</li> </ul>	We welcome these suggestions and will consider them in developing this element, and continue to work with internal colleagues to shape this element.

## Actions to be implemented

- The consultation responses will be considered in shaping the detail on the elements of the FDM. Ongoing engagement with key stakeholders in industry, consumers, FSA colleagues, other government departments, devolved administrations, Local Authorities, the veterinary community, trading partners and other interested parties will continue to inform and help to develop the FDM.
- As the elements of the FDM are designed in more detail, further consultations will take place.



## List of respondents

1. AHDB (Agriculture & Horticulture Development Board)
2. AIMS (Association of Independent Meat Suppliers)
3. AMI (Association of Meat Inspectors)
4. ASG (Abattoir Sector Group)
5. Avara
6. BMPA (British Meat Producers Association)
7. BPC (British Poultry Council)
8. BVA & AVG (British Veterinary Association & Association of Government Vets)
9. CIEH (Chartered Institute of Environmental Health)
10. DPPW (Directors for Public Protection Wales)
11. Eville & Jones senior managers
12. Four Paws
13. FUW (Farmers' Union Wales)
14. IMTA (International Meat Traders Association)
15. Lincoln City Council
16. Members of the public

17. Moy Park
18. NCB (National Craft Butchers)
19. NFU (National Farmers' Union)
20. NFU Cymru (National Farmers' Union Cymru)
21. NIMEA (Northern Ireland Meat Exporters Association)
22. NPA (National Pig Association)
23. Red Tractor Assurance
24. RSPCA (Royal Society for the Prevention of Cruelty to Animals)
25. Unison
26. Which? Consumer Group
27. Change.Org petition – not a formal consultation response but included in the summary report for completeness

## **Additional Feedback Included**

The stakeholders listed below contributed views on the FDM proposals during engagement sessions. This feedback is included in this consultation response report.

1. Consumers - five citizen panels across England, Wales and Northern Ireland
2. CTSI (Chartered Trading Standards Institute)

3. FSA Field Operations employees
4. HCC (Hybu Cig Cymru – Meat Promotion Wales)
5. LMCNI (Livestock and Meat Commission Northern Ireland)
6. NSA (National Sheep Association)
7. Other Government Departments, Devolved Administrations and Local Authorities (Defra teams, DIT, APHA, CVOs, Welsh Government, Scottish Government, FSS, DAERA, NFHFG and NFSFG)
8. RCVS (Royal College of Veterinary Surgeons)
9. SALSA (Safe And Local Suppliers Association)
10. Ulster Farmers' Union
11. WLBP (Welsh Lamb & Beef Producers)