

OPERATIONAL TRANSFORMATION PROGRAMME: PUBLIC CONSULTATION ON THE FUTURE DELIVERY MODEL

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1. Summary

1.1 This paper is an update on the Operational Transformation Programme (OTP) paper presented to the FSA Board on 26 May 2021 and follows a period of public consultation on the Future Delivery Model proposals. The Board is asked to:

- **Note** the broad support for the Future Delivery Model proposals in response to the public consultation exercise whilst acknowledging the consultation has highlighted some aspects that we need to develop further.
- **Endorse** the Future Delivery Model as the foundation and framework upon which the Operational Transformation Programme should be progressed.
- **Comment** on the main deliverables within the programme roadmap which are set to be progressed in the next 12 months.

2. Background

2.1 The Future Delivery Model (FDM) is the foundation for delivering the objectives of Operational Transformation Programme (OTP). It has been developed in line with the guiding principles previously agreed by the FSA Board in 2020. Through the FDM, the FSA will continue to act in the consumer interest on food safety and animal health and welfare, ensuring that the regulatory approach is focused on managing the risks, with businesses that are able to demonstrate their competence benefitting from a tailored regulatory approach.

2.2 The diagram below summarises the key workstreams of the FDM.



2.3 At the FSA Board on 26 May 2021, Board members agreed for the Programme to take the proposals outlined in the FDM to public consultation to gather stakeholder views. The consultation commenced on 28 May 2021 and ran until 23 July 2021.

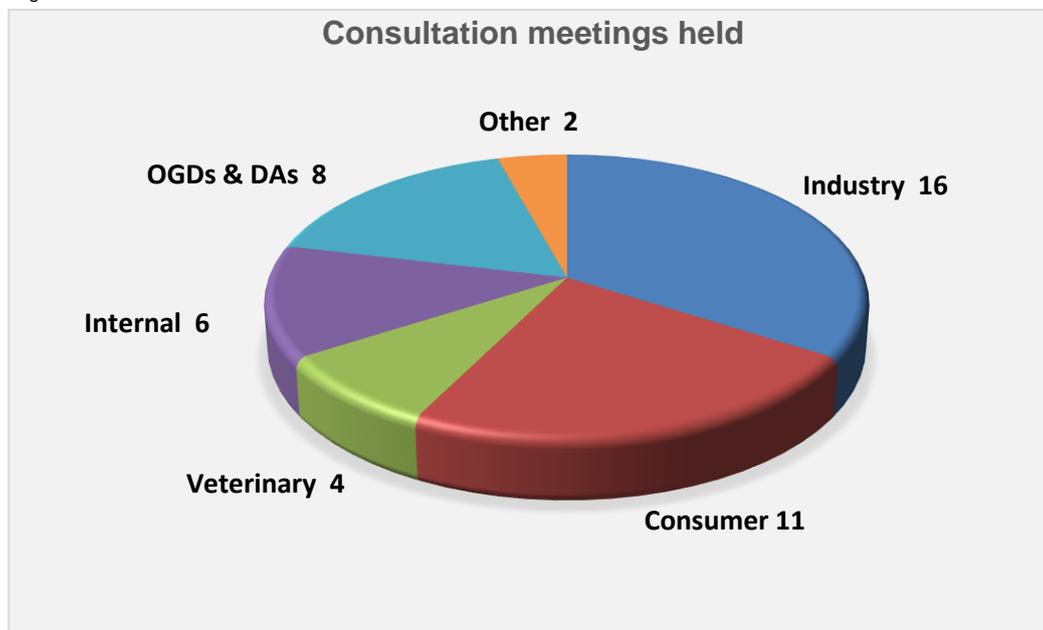
3. The Consultation Process

3.1 The objectives of the public consultation were to engage widely with stakeholders, to discuss the FDM proposals in more detail, to listen to feedback and to establish whether there was a broad base of support for the FDM and the extent to which the framework is able to accommodate key stakeholder requirements. The programme has engaged with a wide range of internal and external stakeholders, including consumers, industry representatives, other government departments, devolved administrations, professional and trade bodies, trade unions, food and animal welfare assurance groups, public health organisations, local authorities, retailers, as well as carrying out internal engagement workshops with FSA colleagues.

3.2 The consultation included consumer engagement, which is of paramount importance to the FSA, through Which? consumer group and consumer panels conducted by Ipsos MORI. The work carried out by Ipsos MORI consisted of 10 consumer panel sessions, across England, Wales and Northern Ireland, which ran independently, with the FSA only in attendance as observers. We have proactively engaged with the meat industry across the whole food chain (from trade bodies to farmers' unions) and interested parties such as the Chartered Institute of Environmental Health and the Chartered Trading Standards Institute.

3.3 The consultation exercise was not a passive exercise of only waiting for formal responses, we also engaged proactively with many stakeholders to seek their views and a total of 41 external and 6 internal meetings / workshops were conducted. A total of 29 formal written consultation responses were received.

Fig.1



Consultation meetings held (information shown by pie chart):

3.4 Consultation meetings held (information shown in Fig. 1):

Industry: 16
Consumer: 11
Other Government Departments and Agencies: 8
Internal: 6
Veterinary: 4
Other: 2

3.5 Whilst this initial consultation on the FDM has now concluded, the programme values the benefits of this exercise and therefore commits to undertake further and wider consultations as the FDM continues to develop. A full breakdown of stakeholder groups can be found at **Annex A**.

4. Analysis of the Consultation Responses

4.1 Our analysis has identified broad support for the proposed risk-based approach as described in the proposals. By grouping the feedback by sectors, we have gained a better understanding of the themes / concerns that are important to different stakeholder groups. The consultation has also highlighted key areas that will require significant further research and work. This phase of the consultation on the FDM is now concluded but the team will continue to engage

with stakeholders to explore issues as the work progresses. We will deliver further public consultations as regulatory reform proposals are developed. A full breakdown of themes and concerns raised by sector can be found at **Annex B**.

4.2 The radar map below illustrates frequently raised discussion points during the consultation, Consumer Trust & Food Safety (89%) being the most often mentioned topic, which is in alignment with consumer trust being at the core of our key principles for the programme, which are:

- **Accountability** – development of a risk-based approach to ensure that accountability for the production of safe food is at the right level.
- **Technology** – to be innovative, utilising technology where appropriate.
- **Value for Money** – development of a cost-effective future delivery model providing value for money for the taxpayer.
- **EU Exit & Trade** – to protect current and future trade.
- **Resource Availability** – development of a flexible model that ensures we have the right resource in the right place, at the right time.
- **Responsiveness** – to enable us to respond effectively to food-borne outbreaks and other incidents, such as COVID-19.
- **Trust & Food Safety** – remaining at the very heart of everything we do.

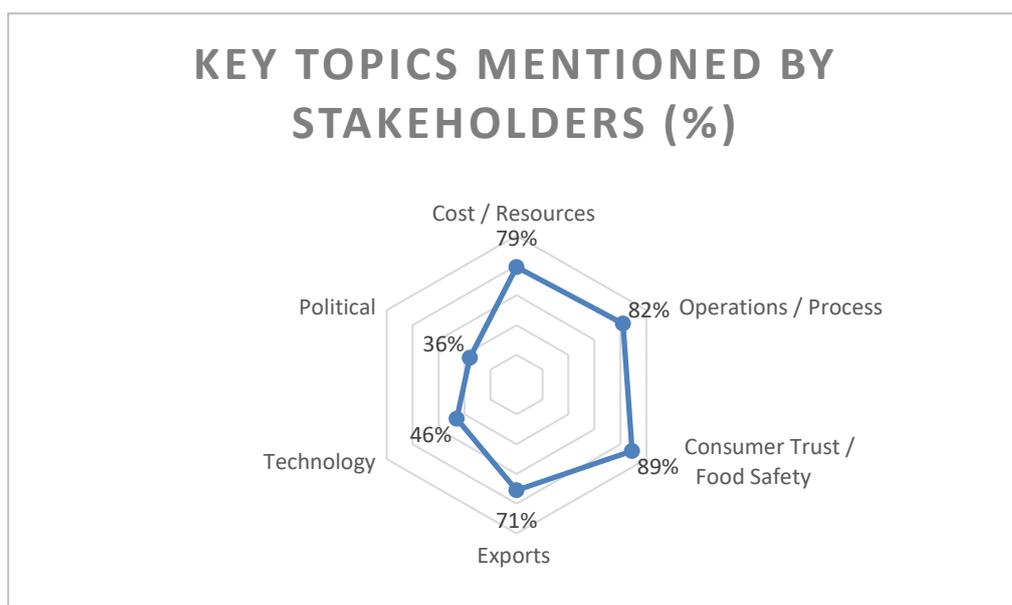


Fig.2

4.3 The different kinds of key topics mentioned by stakeholders when considering the merits of the Future Delivery Model (information shown in diagram above):

- Consumer Trust/Food Safety: 89%
- Operations and Process: 82%
- Cost/Resources: 79%
- Exports: 71%
- Technology: 46%
- Political: 36%

4.4 The radar diagram shows the key topics, both positive and negative, which stakeholders raised during the consultation (for example, of the 28 formal responses received, consumer trust and food safety was raised by 25, which equates to 89% of all stakeholders during the consultation) and these have been interpreted as the most important topics for stakeholders when developing the FDM.

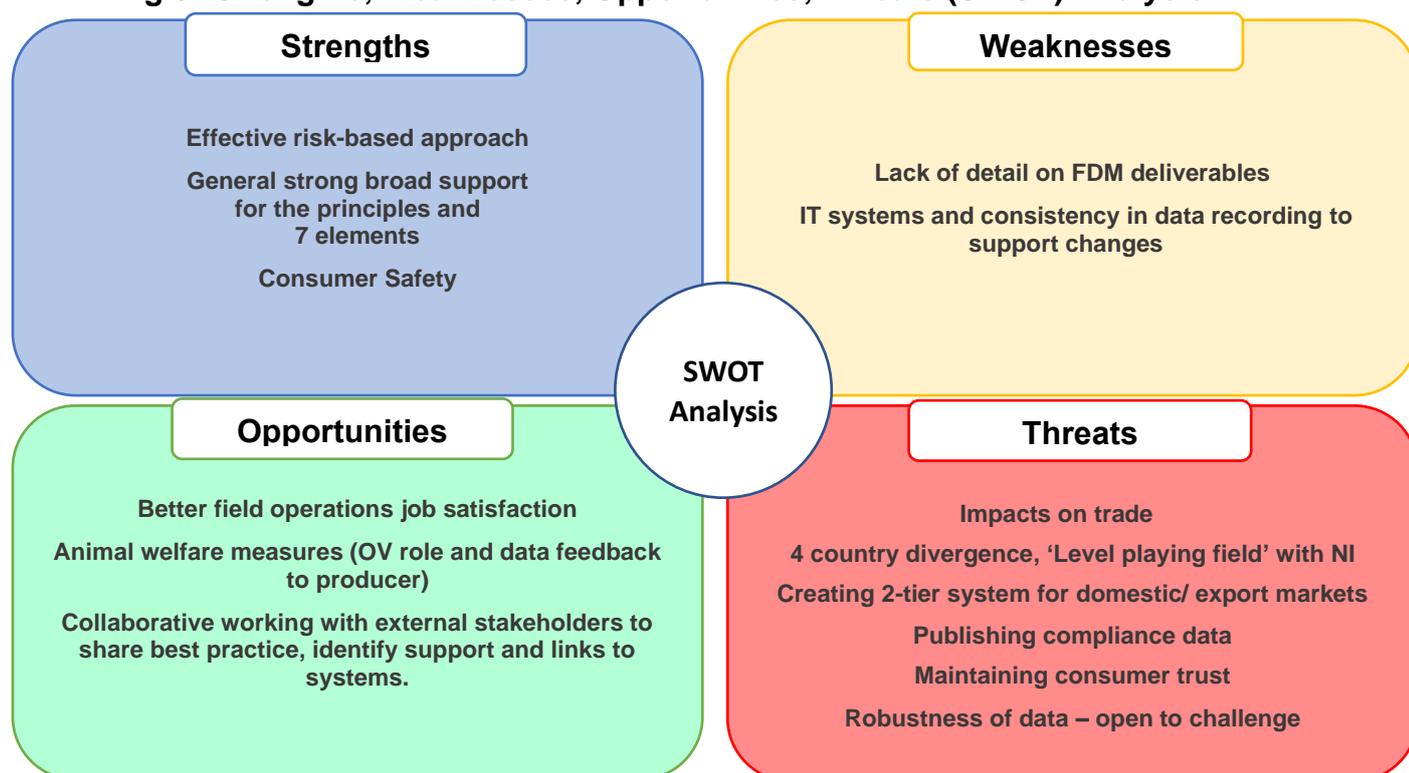
- **Consumer Trust / Food Safety** (89%): stakeholders talked about impacts of the FDM on consumer trust and / or food safety, the importance of maintaining or enhancing these and the concern of not letting these decline in any way.
- **Operations / Processes** (82%): stakeholders discussed changes to current operating practices, regulations, new ways of working. Animal health and welfare also featured strongly here.
- **Cost / Resource** (79%): stakeholders expressed views on the financial impacts of the FDM on businesses, the FSA and the consumer, and resources required for the FDM in terms of personnel, time and training.
- **Exports** (71%): stakeholders talked about the impacts of the FDM on exports, and the differences in regulation for domestic markets and export markets, implications / complications and practicalities.
- **Technology** (46%): stakeholders discussed the use of technology and how / where it can be used in the FDM, examples being data usage, IT systems, CCTV and AI.
- **Political** (36%): stakeholders discussed the potential political impacts of the FDM, examples being maintaining alignment where required, impacts on devolved administrations and the 4-country approach, impacts of EU exit and the Northern Ireland Protocol.

4.5 A sample of stakeholder feedback / comments obtained through the consultation can be found at **Annex C**.

5. Impact of the Public Consultation on the Future Delivery Model

5.1 The consultation has given us a rich understanding of key themes / concerns and the areas that are going to require significant further research and work. The initial SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis highlights that, whilst there is a broad support for the aspirations of the FDM, there are also a number of challenges. These challenges will be considered in the programme development.

Fig.3 Strengths, Weaknesses, Opportunities, Threats (SWOT) Analysis



Strengths

5.2 Alongside ongoing commitment to consumer safety, there is strong support across a range of stakeholders for optimising the effectiveness of the risk-based regulatory approach and for the principles and elements of the FDM. This provides assurance that we have a solid platform to continue to develop the programme with continuing stakeholder engagement.

Weaknesses

5.3 The FDM continues to evolve, and many stakeholders understandably want more detail that is not yet available. Further work on developing the proposals continues, with input from stakeholders, allowing the details to be progressed, which should help to address this concern.

5.4 The robustness of data, in general, was raised by a range of stakeholders - from ensuring we have consistency in data recording methods to ensuring we record only what is necessary. The programme is working in this area with FSA colleagues in Openness, Digital and Data and some external stakeholders to begin to explore opportunities for how we can address these concerns through improvements in the consistency of data recording methods and the further development of systems.

Opportunities

5.5 The consultation identified a number of potential opportunities and areas for the programme and its stakeholders to explore.

- 5.6 Greater collaboration by sharing best practices and systems (e.g., animal health and welfare measures and improved food chain information) was highlighted as being welcomed, with frequent reference to taking the opportunity to feed data back from the slaughterhouse to the producer in order to improve the health and welfare of animals.
- 5.7 In addition, a keenness to work with the programme and offer insight into various networks and systems that could potentially be utilised for compatible, accurate and timely data sharing. By working together these opportunities can be explored in more detail.
- 5.8 Similarly, there were offers to support the programme in identifying ways to improve the role, recruitment, retention and career pathways of Official Veterinarians and Meat Hygiene Inspectors.

Threats

- 5.9 In the event the FDM introduces separate regimes for the domestic and export markets, stakeholders highlighted the complexity in separating production for the domestic market from that destined for export markets. The programme would need to consider how to assure trade partners that nothing produced under a “domestic regime” ends up on the export market (including animal by-products).
- 5.10 As highlighted in ‘Weaknesses’ above, more work is required to ensure data is robust and open to scrutiny. For example, regarding a “league table” in terms of transparent compliance, there were some polarised opinions for and against (some industry stakeholders were against this suggestion whereas consumers, via the citizen panels, were largely in favour). This divergence in views, along with their concerns need to be understood and will require further consultation work with stakeholders to assess how to take forward.
- 5.11 Crucially, the consultation has not identified significant obstacles in progressing with development of the FDM, acknowledging that as a framework, it is sufficiently broad to accommodate or work through the issues and risks that have been identified. It should be reiterated that whilst there are challenges, there is broad support for the move to a risk-based approach to delivery and for each of the elements that make up the FDM. The SWOT analysis has helped frame the recommendations in this paper and will continue to shape the Future Delivery Model.

6. Challenges

- 6.1 Despite the broad acceptance of the FDM, there remain a number of high-profile, previously identified challenges that were raised again during the consultation. These require more attention and working through them is a priority:

- The implications of the FDM on the export market – whilst the Programme’s primary objective is consumer trust and food safety, another programme principle is to support trade, both now and in the future. Whilst looking to maximise opportunities for the domestic market, it is important to recognise the need to fulfil our ongoing obligations with regards to exports (including animal by-products). Therefore, the Programme and wider FSA will continue to consider how implementing the FDM will be viewed by international trading partners and how this will impact on different sectors – i.e., those trading mainly domestically, those with mixed destinations and those with significant export markets. Many respondents have re-emphasised the need to protect export markets, the importance of these in supporting British produce (e.g., export of Welsh lamb).
- The regulatory burden on smaller businesses – current proposals focus on a proportionate regulatory approach, and the Programme will continue to work with stakeholders to ensure that any proposed changes do not inadvertently disadvantage smaller businesses.
- The ability of small and medium business to adopt flexibilities where capital investment is required, for example, to install new technology. Larger businesses may have an advantage in being able to accommodate this compared to smaller businesses. There is a risk that smaller businesses may be unable to take advantage of some of the flexibilities facilitated by the use of more modern technology.
- Industry have raised concerns about how we ensure an ongoing ‘level playing field’ is retained with export markets, in particular:
 - The Programme and wider FSA are aware that the OTP proposals will need to consider the impact on trade across the UK Internal Market including movements of goods between GB and NI. Our work to develop proposals in this area will factor in obligations under the Northern Ireland Protocol (NIP) noting that the UK Government is seeking to negotiate significant changes to this as set out in the NIP Command Paper published by the UK Government in July 2021. All proposals will be consulted on, and our proposals will take account of consumer and stakeholder interests including those in NI.
 - The UK is party to a number of Free Trade Agreements including the Trade and Cooperation Agreement (TCA) with the EU. All future domestic policy development, including the OTP, will take account of our international obligations including the TCA.

7. Insight from Consumer Panels

- 7.1 In general, the participants on the consumer panels had a lack of awareness about the controls in place to ensure that meat is safe for human consumption

and the FSA's role and responsibilities. Whilst participants were reassured by the nature, extent and thoroughness of the current Official Controls processes, they were also surprised by the level of FSA presence required to deliver them, understanding the need for modernisation and the potential benefits of the FDM.

- 7.2 A summary of consumer views can be found at **Annex D**. Going forward, we see a need to identify other consumer groups from which we may be able to add further insights on top of those already offered.

8. Proposal to Proceed with the Future Delivery Model

- 8.1 The feedback from the consultation exercise demonstrates strong support for the different facets of the FDM, as described above, and the Programme Team is, therefore, recommending to the Board that the FDM is endorsed as a foundation upon which the Operations Transformation Programme (OTP) should be progressed and the framework within which Official Controls delivered directly by the FSA, should be reformed.
- 8.2 Of course, it is recognised that at this stage more work is required in some areas, for example, stakeholder feedback reiterated the need to protect export markets and more analysis is required to understand how the FDM approach to delivering Official Controls might be viewed by trading partners overseas, as well as, understanding the impact of implementing the FDM on those different sectors – i.e., those trading domestically, those with mixed destinations and those primarily focussed on exports. We will consider how best to mitigate any concerns that could arise from the FDM on the export market and / or the movement of product to NI.
- 8.3 As well as having regard for different markets, the consultation has also highlighted we need to be alive to how the FDM might be applied to businesses of different scale and technological capability.
- 8.4 The ongoing engagement with internal and external stakeholders, which has not ended at the point of concluding this consultation exercise, is providing valuable insights to enable the Programme Team to identify and refine specific deliverables to be implemented over the lifecycle of the programme in order to deliver the FDM.

9. Next Steps and Programme Roadmap

- 9.1 Specific aspects of the FDM will be introduced over several years, as it is recognised that some proposals will require legislative change. Where changes can be made within the current legislative framework, they are being prioritised and planned as part of the OTP delivery roadmap. This will ensure the ongoing, controlled and incremental delivery of changes throughout the 5-year lifecycle of the Programme.

- 9.2 We will revert to Cabinet Office (which was requested by October) indicating our proposed model for the future delivery of Official Controls.
- 9.3 Priority areas for the next 12 months (which includes both implementation activities and trials) will be:
- Official Veterinarian (OV) Capacity – A review is underway to understand how to resource the OV workforce. Initial findings to be reviewed later this year with a view to developing a future model that can be implemented by March 2023.
 - Segmentation of businesses based on the risk model - this will use scientific analysis and available data to segment businesses according to risk. This will allow more effective deployment of FSA resources to address food safety and animal health and welfare risks and more efficient use of resources in compliant businesses, with reduction in regulatory burden for them, which will free up resource to deliver the former. This segmentation tool is still under development and once mature, further review, testing and refinement will take place via industry consultation.
 - Food Business Operator Audit process – following further testing, to formalise the use of remote audits introduced as part of the FSA Covid-19 response into normal “business as usual” activity.
 - Implementation of flexibilities under the existing legislative framework (changes consistent with the Official Controls Regulation 2017/625) including:
 - PMI inspection in low-capacity establishments
 - Representative *postmortem* inspection (PMI) sampling in Poultry slaughterhouses (trial)
 - Digital Approvals – This will allow operators applying for approval to operate to submit an application and supporting evidence to the FSA digitally.
 - Remote Audit Technology (trial) – this will develop the processes applied during COVID-19 and trial digital tools to deliver remote audits.
- 9.4 More details are available in the latest version of the OTP Delivery Roadmap at **Annex E**. This product will be amended as additional deliverables are identified through ongoing engagement with key stakeholder groups.

10. Recommendations

10.1 The FSA Board is asked to:

- **Note** the broad support for the Future Delivery Model proposals in response to the public consultation exercise whilst acknowledging the consultation has highlighted some aspects that we need to develop further

- **Endorse** the Future Delivery Model as the foundation and framework upon which the Operations Transformation Programme should be progressed.
- **Comment** on the main deliverables within the programme roadmap which are set to be progressed in the next 12 months.

ANNEXES

Annex A – Breakdown of Stakeholders who attended a consultation meeting

The chart in the paper (and the list below) indicates the stakeholders engaged with during the consultation period. Some of the stakeholders invited, however, declined or were unable to participate and are not included in the chart above (and the list below). In these cases, previous engagement had occurred prior to the FDM Board Paper publication in May 2021 and links to the proposal and the consultation document were issued, and written feedback was invited. The consultation was also publicly available and open to all to respond.

Industry Stakeholders

- Abattoir Sector Group (ASG)
- Association of Meat Inspectors (AMI)
- British Meat Producers Association (BMPA)
- British Poultry Council (BPC)
- Farmers' Union Wales (FUW)
- Hybu Cig Cymru (HCC – Meat Promotion Wales)
- Livestock & Meat Commission Northern Ireland (LMCNI) and Northern Ireland Meat Exporters Association (NIMEA) joint session
- National Craft Butchers (NCB)
- National Farmers' Union (NFU)
- National Farmers' Union Cymru
- National Pig Association (NPA) and Welsh Lamb & Beef Producers (WLBP) joint session
- Red Tractor Assurance
- RSPCA Assured
- Safe & Local Supplier Association (SALSA)
- Ulster Farmers' Union
- Unison

Consumer Stakeholders

- 10 x Citizen Panels via Ipsos MORI
- Which?

Veterinary

- British Veterinary Association (BVA)
- Royal College of Veterinary Surgeons (RCVS)

Internal

- All Staff
- 2 x Change Champions sessions
- Eville & Jones (E&J)
- Field Operations National Evening Engagement Call
- FSA Vets

OGDs & DAs

- Animal and Plant Health Agency (APHA)
- Department of Agriculture, Environment & Rural Affairs (DAERA), including Chief Veterinary Officer NI
- Defra Teams Sessions, including Chief Veterinary Officer, UK – invited Animal Health & Welfare, Official Controls Regulation Policy, Rest of the World Trade, EU Exit & Negotiations, Agri Food Chain, Market Access, Trade, Imports, and Sanitary and Phytosanitary (SPS) Strategy & Coordination.
- Department for International Trade (DIT)
- Scottish Government (This meeting included representatives from Food Standards Scotland)
- UK Mission (UKMIS)
- Welsh Government, including Chief Veterinary Officer Wales

Other Professional Bodies

- Chartered Institute of Environmental Health (CIEH)
- Chartered Trading Standards Institute (CTSI)

Please note, Food Standards Scotland have not been included separately on this list as they sit on the Programme Board and contribute to the decision-making process, and more widely officials from the devolved administration in Scotland were involved in the consultation exercise (as listed above).

Annex B – Breakdown of themes and concerns by sector

Sector	Feedback Themes	Concerns / Risks
Consumers and consumer group	<ul style="list-style-type: none"> Support risk-based approach. See benefits of tailored presence but cautious. More comfortable with tailored presence being supported by increase in unannounced inspections and transparent compliance – publicly available. Clearer accountability and greater use of technology could increase compliance. 	<ul style="list-style-type: none"> Businesses may take opportunity to drop standards with less FSA presence. Strong opposition to creation of a 2-tier system for domestic and export consumers. Must increase or maintain UK standards.
Industry and 3rd party assurance bodies	<ul style="list-style-type: none"> Strong support for risk-based approach, tailored presence and digitised data to allow more proportionate approach to regulation. Want to see abattoir data fed back to the producer. Some focus on animal welfare – strong links to food safety. OV resource needs addressing urgently. Robustness of data for segmentation analysis. 	<ul style="list-style-type: none"> Publication of compliance / performance data to retailers and consumers – perceived unfair competitive levers and misunderstanding by consumers. Differences for domestic and export markets and creating 2-tier systems including between the 4 devolved administrations. Impact on trade negotiations and NIP, and NI industry concern about the impact on a 'level playing field' between GB and NI.
Other Govt. Depts, devolved administrations and Local Authorities	<ul style="list-style-type: none"> Broadly supportive of ambition and keen to stay involved. Urged caution and sensitivity towards divergence. 	<ul style="list-style-type: none"> Impact on trade negotiations with EU and concern regarding Northern Ireland Protocol. Lack of comprehensive evidence base to support the changes. Divergence with UK countries' systems.
Veterinary	<ul style="list-style-type: none"> Emphasised importance of veterinary role in the delivery model. Suggestions to enhance the vet role to improve recruitment and retention. Animal health and welfare considerations. 	<ul style="list-style-type: none"> The four-country framework and other country relations. Impacts on trade. Complexities of moving to a separate domestic / export market.
Internal	<ul style="list-style-type: none"> Interest in professionalism of meat hygiene inspector and official veterinarian roles. Need more detail on what the future will look like. 	<ul style="list-style-type: none"> Future of meat hygiene inspectors. Businesses taking opportunity to cut

	<ul style="list-style-type: none">• Animal welfare considerations.• Support improvements to technology and data.	<p>corners and drop standards with less FSA presence.</p> <ul style="list-style-type: none">• Differences between England and Wales with Scotland and Northern Ireland.• Unannounced inspection is known on arrival at business.• The quality of some assurance schemes.
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Annex C - Engagement Feedback quotes

The following are direct feedback quotes, both favourable and challenging quotes, from our stakeholders. Detailed further analysis is about to begin draw out the opportunities and begin to mitigate the challenges.

Favourable

“Industry encourages the FSA to be bold, innovative and develop a future proofed model that is world leading.” - **Industry**

“The role of an OV needs to change, not only to make it a more attractive proposition to UK veterinary graduates, but also to ensure that the talents of a qualified MRCVS are fully utilised and add value” - **Industry**

“Members tell us that they value low and medium throughput abattoirs as they provide a range of alternative services and marketing options. We therefore need to ensure that any FDM takes account of these smaller FBOs and seeks to reduce the overall burden and costs associated with OCs” - **Industry**

“It is an opportune time to review the current model, reassess the incentives and disincentives for compliance and ensure that a more robust system is in place that will give consumers confidence that they can trust the safety of the meat they buy.” – **Consumer**

“Ensuring that industry understands why they need to do things drives compliance more than ‘tick box’ exercises” – **OGD**

“We urge FSA to ensure that proposals bolster the UK's reputation as a global leader in food safety and animal welfare by investing in the veterinary-led team in food hygiene and public health roles for both the domestic and export markets” – **Veterinary**

“Supportive of IT and new technology to assist with daily duties. Welcoming of upskilling duties.” – **Internal**

“A sustainable, competent and resilient workforce will assist in ensuring public health objectives in delivering OCs in the meat sector” – **Other**

Challenging

“We believe the risks associated with the full publication of compliance data is not in the interest of producers or the wider supply chain.” – **Industry**

“We oppose the attempt to undermine the role of independent, state Meat Hygiene Inspectors and Official Veterinarians from protecting the consumer from food not fit for human consumption or wholesome.” – **Industry**

“It is important that the FSA is able to demonstrate that these reforms will deliver stronger protections and will not create a two-tier system for domestic supply and exports, where UK consumers lose out.” – **Consumer**

“It would be helpful to better understand how Official Veterinarian oversight for animal welfare will be maintained as FBOs take more responsibility for daily inspection activities with FSA responsible for assuring this activity.” – **Veterinary**

“If FSA Independent inspectors are removed from 100% inspection even in highly compliant plants with minimal rejections and a minimal risk standing, how many corners will be cut leading to an elevated risk of potentially unfit meat entering the food chain.” – **Internal**

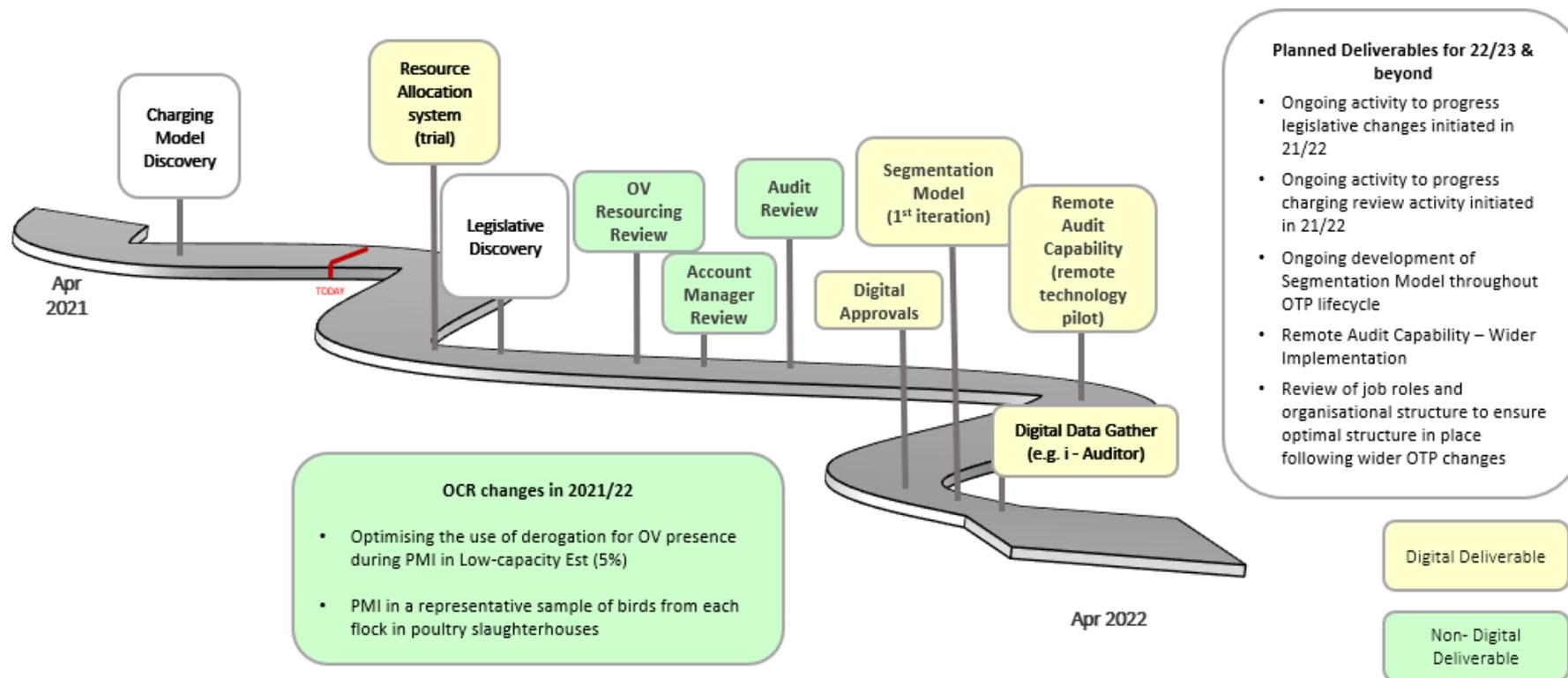
“The consultation does not have sufficient regard to the potential impacts of the proposals on public health. The primary focus should be to deliver the best outcomes for consumers and the food industry.” – **Other**

Annex D – Summary Findings from the Consumer Panels – Suggested Benefits, Concerns and Reassurances

Summary findings from the Consumer Panels

- There was limited awareness of current regulations related to food
- The Official Controls process was seen as thorough, and this influenced subsequent views of the FDM.
- After hearing the case for change, participants often had greater appreciation for the FDM
- Some participants remained worried that standards would slip
- There were concerns that compliant businesses could become complacent and a need for reassurance that standards would not slip
- Greater accountability could result in a conflict of interest for FBOs
- Participants wanted independent verification of those inspecting meat
- Support for a Robust Assurance Regime with the FSA setting the industry standard
- Listing the organisations involved would increase consumer confidence
- Transparent compliance could incentivise improved standards
- Information should be clear and avoid raising concerns about meat safety

Annex E – Programme Deliverables for 2021/22 & 2022/23



Annex E (cont.) – Planned deliverables for 21/22

	2021/22 Deliverables	Description
Digital Deliverables	Resource Allocation System	Trial an 'Off the shelf' third-party tool to automate MHI resource allocation in Field Operations.
	Segmentation Model (first iteration)	Develop and socialise initial Minimal Viable Proposition version of the tool to that will be used to provide a risk based FBO assessment
	Remote Audit Capability (Pilot)	Piloting the use of a digital application to allow remote real-time viewing of on-site video/audio footage to support remote audits
	Digital Approvals	Delivery of a digital solution to allow FBOs to upload supporting evidence digitally as part of FSA approvals process
	Digital Data Gather	Delivery of a digital data-gather tool for use by on-site auditors to modernise data collection process
Non-Digital Deliverables	Audit Review	To conduct a review of FBO audit activity to ensure the effective introduction of remote audits as a viable business as usual option (following use during COVID-19 response)
	Account Manager Review (Enhanced Assurance Initiative)	Review and potential expansion of FO Account Manager role to increase coverage and adopt lessons learned during COVID-19 response
	OV Resourcing Review	Review of future resourcing the OV role in response to CO challenge to move away from single SDP – due to report to EMT in Nov 21
	Optimising the use of derogation for OV presence during PMI in Low-capacity Est. (5%)	Exploring the process and potential coverage of this existing derogation to identify further relevant FBOs that may be able to benefit.
	PMI in a representative sample of birds from each flock in Poultry slaughterhouses (Trial)	Ongoing engagement with Industry to determine entry requirements to trial this flexibility.
Enabling Activity	Legislative Changes	Activity starts in 21/22 to recruit expert resource to identify/articulate requirements and draft necessary legislative changes to support OTP
	Charging Model Changes	Activity to identify principles that will inform charging model changes to support wider FSA strategic objectives
Proposed future deliverables - 22/23 and beyond (This list is not exhaustive)		
Legislative & Charging Model Changes, (Ongoing) Ongoing development of Segmentation Model throughout OTP lifecycle Remote Audit Capability – Wider Implementation Food Safety Culture Assessment Tool Operational Task Force Transparent Compliance consultation Artificial Intelligence Monitoring of CCTV (Trial)		