

# Rural Development sub-Committee

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## Evidence from Association of Independent Meat Suppliers (AIMS)

### Rural Development Sub-Committee Inquiry into Animal Welfare and Meat Hygiene at Abattoirs and Slaughterhouses in Wales

The Association of Independent Meat Suppliers (AIMS) is very grateful to be given the opportunity to provide evidence to the Inquiry.

The Inquiry is clearly concerned with the implementation of animal welfare and meat hygiene legislation as it stands at present.

However AIMS believes that there are significant problems with the legislation itself that need to be understood in order to inform the Sub-Committee's discussions, and sets these out briefly below before addressing the consultation questions. AIMS is aware that the Food Standards Agency (FSA) shares its view that meat should not be treated in a different way to other foods with regard to official controls and is supportive of the Agency's programme to achieve change to the EU legislation.

#### Background

Abattoirs, uniquely among food businesses and all other businesses for that matter, are subject by EU Regulation to the permanent presence of officials. Those officials carry out two main tasks. They audit the controls the operator is required to have in place in order to manage any risks to animal welfare and public health; and they carry out veterinary ante-mortem inspection of all animals and post-mortem inspection of all carcasses, and health mark all red meat carcasses they assess as fit for human consumption. The general rule is that at least one official must be a veterinarian, but the legislation does provide some flexibility in this regard to premises that operate "discontinuously".

New EU legislation, which came into force in 2006, requires abattoir operators only to accept animals that are healthy, as far as they can judge, for slaughter. It also introduced a requirement for farmers to send "food chain information" with all animals that guarantees each animal is suitable for slaughter for human consumption.

Post-mortem inspection by officials has been a requirement for many years and was introduced at a time when animal diseases were less well controlled. Procedures for carrying out post-mortem inspection are laid down in detail in the legislation and it is the major cost element of official controls. Perversely such inspections do not identify the common causes of food borne illness associated with meat today i.e. Salmonella, Campylobacter and E. coli O157, all of which are carried by healthy animals. Post-mortem inspection could therefore be regarded as a quality control procedure that in any other industry would be the responsibility of the operator.

2. The greatest risk to public health from meat results from the contamination of carcasses with the pathogenic bacteria referred to above. Some contamination is inevitable during dressing and it is essential that further down the food chain meat is handled and cooked so as to control any resulting risk. It is the responsibility of the abattoir operator to ensure that contamination of carcasses is minimised, and the role of the official veterinarian to audit the operator's controls and take appropriate enforcement where necessary to protect public health.

Animal welfare is again the responsibility of the abattoir operator, with the official veterinarian responsible for verifying compliance.

Official controls at abattoirs are chargeable to industry, but at present the cost is shared between operators and the FSA. The FSA's policy is to transfer its share of the funding to the industry or Rural Affairs Departments, so that it can spend its resources on issues of greater concern to public health. The industry is unwilling to pay a larger share whilst it considers the Meat Hygiene Service to be inefficient, but would be willing to fully fund a cost-effective service.

Although the legislation makes it clear that abattoir operators are primarily responsible for the welfare of the animals they slaughter and the safety of the food they produce, the fact that officials are permanently present at abattoirs, charged for and carry out inspections that in any other industry would be the responsibility of the operator, results in confusion as to who is really responsible. AIMS also questions whether an official who is permanently present at a premises, and has animal welfare and food safety responsibilities, is best placed to audit controls at that premises. Clearly unannounced visits as recommended by Professor Pennington are not in the official veterinarian's tool box under the present arrangements.

AIMS suggests that it can never be cost effective to have a highly experienced veterinarian permanently present at every slaughterhouse when only healthy animals are allowed to be accepted for slaughter. In the past when official veterinarian presence was part time, many official veterinarians were local veterinary practitioners. Such a system provided valuable income to rural practices and experienced clinicians to abattoirs. Now nearly all official veterinarians are provided to MHS by contractors, and are paid for by the hour not for the job done. This has resulted in a system favouring the employment of the least experienced veterinarians for the maximum number of hours.

The delivery of official controls in meat plants in GB was comprehensively reviewed by the FSA in 2007 when two options for delivery were considered in detail - a transformed MHS or outsourcing the controls to a third party or parties. The FSA decided to pursue a transformed MHS model, if it could meet stringent targets, but has now indicated that the two Agencies will merge from April this year.

### How Effective are the Current Enforcement Structures on Animal Welfare and Meat Hygiene in Abattoirs and

## **Slaughterhouses?**

There have been a number of indicators in recent years that question the effectiveness of the current enforcement structures. They include reports of the European Commission auditors of the Food and Veterinary Office (FVO), the South Wales E. coli Inquiry and recent covert animal welfare operations.

3. Standards at slaughterhouses have undoubtedly improved since 2006 as a result of an exercise in which all meat premises were re-approved by experienced Veterinary Meat Hygiene Advisers (VMHAs) of the FSA. Less than 30% of UK abattoirs were found to be fully approvable at the first VMHA visit, despite years of permanent supervision by an official veterinarian. However given clear guidance on what was required to comply, the vast majority of premises have since been fully approved, often after considerable investment. It is worthy of note that in Wales a significantly higher percentage of premises were fully approved on the first occasion. This was explained by additional pre-approval input from the VMHA, who was an employee of the Welsh Assembly and who has since retired and not been replaced.

Although AIMS recognises that MHS has significantly reduced its costs since transformation we have seen no evidence as to whether its effectiveness has or has not been improved. We suspect that, as the MHS system for procuring official veterinarians has favoured the employment of inexperienced and poorly paid veterinarians, an independent and transparent audit would show that at best there has been no improvement. It is a concern that despite such an audit being a requirement of EU Regulations, none has been carried out on the performance of the transformed MHS.

## **How Should Veterinary Supervision Arrangements be Delivered in Abattoirs and Slaughterhouses in Wales?**

AIMS believes that more effective official controls could be achieved in abattoirs, under existing legislation, if inspection tasks were separated from audit tasks and enforcement. This would allow the limited number of experienced veterinary meat hygienists to target the main risks to animal welfare and public health through audit and enforcement. It would entail establishing a small team of experienced veterinarians that would visit all abattoirs at a risk-based frequency to audit both operator's controls and the official inspection tasks. Such systems operate very successfully in many other Member States and third countries e.g. Holland and New Zealand.

There are a number of ways such a system could be organised. Both the inspection and audit teams could remain as parts of FSA, or separate government departments, agencies or local authorities could provide them. The possibility of outsourcing the inspection team could also be revisited.

## **How Effective is the Relationship Between the Meat Hygiene Service and the Industry**

It is unfortunate that there has historically been a problem of trust between various elements of the MHS and industry at a variety of levels. At plant level the lack of experience of official veterinarians, and enforcement that has not been risk based has led to poor working relationships. Higher up in the MHS a lack of vision and bureaucracy has impacted badly on attempts to make MHS more efficient. This has been compounded by the MHS having two lines of command - one for delivery and one for technical issues, which has resulted in plant based staff having more than one master.

The FSA has recently stated that it seeks compliance rather than closure of businesses that are willing to address any compliance issues. Recent assurances from the two MHS Business Directors that they wish to work with industry to overcome existing problems are therefore very welcome, but must be contrasted to the stance of others that industry alone is responsible for all current problems.

## **Could the Welsh Assembly Government Take any Further Action to Ensure the Proper Implementation of Relevant Legislation on Meat Hygiene and Animal Welfare in Abattoirs and Slaughterhouses in Wales?**

AIMS fears that MHS is irreparably broken in its present form and only radical change can bring about more effective implementation of the legislation. It may be that following the merger with the FSA in April that change will occur. However, in the absence of any detailed information on the merger or the proposed future structure or management of the delivery of animal welfare and meat hygiene controls, concerns remain.

In the view of AIMS the Welsh Assembly should consider the separation of the delivery of inspection tasks from the audit and enforcement functions. This would allow the limited number of experienced veterinarians available to target the protection of animal welfare and public health through risk-based audit and unannounced inspections.

Whatever action the Welsh Assembly takes it can be assured that AIMS will play a positive role in improving the effectiveness of controls.