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Our Ref: GH/KS/SAJ/Cons.

8 January 2010

Aled Elwyn Jones  
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Rural Development Sub-Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
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Dear Mr Jones

**Re: Inquiry into animal welfare and meat hygiene**

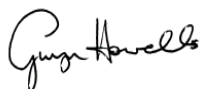
Thank you for the opportunity to present evidence to the above inquiry.

Hybu Cig Cymru - Meat Promotion Wales (HCC) is the industry-led organisation responsible for the development, promotion and marketing of Welsh red meat. HCC's stakeholder representatives implement, on behalf of all Welsh farmers and other key industry participants, a strategic plan to develop profitable and sustainable markets for Welsh red meat to derive benefit for all in the supply-chain.

HCC's comments on the questions raised are outlined in the attached document.

We hope that these comments are useful in your deliberations and look forward to presenting oral evidence on 14 January 2010.

Yours sincerely



**Gwyn Howells**  
**Chief Executive**

## Hybu Cig Cymru – Meat Promotion Wales (HCC)

### Written Evidence to the National Assembly for Wales Inquiry into Animal Welfare and Meat Hygiene (January 2010)

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#### **Q1. How effective are the current enforcement structures on animal welfare and meat hygiene standards in abattoirs and slaughterhouses?**

High standards of animal welfare and meat hygiene are considered a priority by HCC to ensure quality products are produced and consumer confidence is maintained. The current enforcement structures are facilitating this well and the Welsh red meat industry enjoys a good reputation.

Whilst EU regulations require Food Business Operators (FBOs) to have full responsibility for animal welfare and food safety in slaughterhouses, it is the role of the Meat Hygiene Service (MHS) to deliver official controls in approved meat premises to protect public health, animal health and welfare. This is done through the enforcement of Wales, GB and European legislation. The MHS provides a range of services in approved meat premises in Wales and across GB and is an executive agency of the Food Standards Agency (FSA). The operation of the FSA in the UK and the MHS in Wales and other countries in GB is funded by the Welsh Assembly Government, UK Parliament, Scottish Government and Northern Ireland Assembly respectively. Services provided by MHS are also charged to the FBO. The FSA plans to formally merge the FSA and the MHS subject to formal approval from Government with full transition to be completed by March 2011.

A strategic objective of *the FSA Strategy for 2010 – 2015* is that food produced or sold in the UK is safe to eat. A second objective is that regulation is effective, risk-based and proportionate, is clear about the responsibilities of food business operators and others, and protects consumers and their interests. According to the FSA, annual resource needs for effective, risk-based and proportionate regulation for 2011/12 onwards is £67.4 million (costs include meat hygiene inspection) which represents 44.6 percent of the total FSA annual resource needs of £151 million. The FSA strategy also recognises that in terms of impact, failure by food businesses to apply critical food safety measures necessary for the safe production of food can lead to large scale food poisoning outbreaks. Food safety measures are underpinned by EU legislation and enforced through inspectors. Business compliance to legislative requirements is therefore one proxy for public health protection.<sup>1</sup>

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<sup>1</sup> FSA Board Open meeting 10 November 2009 paper FSA 09/11/04

## **Q2. How should veterinary supervision arrangements be delivered in abattoirs and slaughterhouses in Wales?**

HCC agrees that supervision in abattoirs and slaughterhouses in Wales is essential to maintain high standards of animal welfare and ensure adherence to legislation on animal welfare.

The role of the Official Veterinarian (OV) is important to ensure that post mortem inspection is undertaken at abattoirs and slaughterhouses in Wales. Currently, the OV also undertakes ante-mortem inspection which is key in monitoring animal welfare and food chain information (FCI). Post-mortem inspection is also vital in providing for defect detection and disease identification as well as recognition of contamination of products; identification of Specified Risk Material (SRM) remaining in food; routine testing for residues; and sampling for example bovine TB and Campylobacter.

In terms of key roles and responsibilities within the MHS, veterinary supervision is coordinated by business managers who are responsible for the management of a number of clusters, with the aim of ensuring a optimum use of staff; leading stakeholder relationship management; as well as providing leadership and performance management. Lead Veterinarians provide the technical and business management for each cluster. OVs are the MHS team leaders at the plants and have management responsibility for the MHS Plant Team Leader and Meat Hygiene Inspectors (MHIs). Contractors provide the majority of OV support and supplement the teams of MHIs. Where considered necessary it is the role of the MHS to initiate enforcement action when an FBOs food safety management systems fail to fully protect public health, animal health or welfare.

In the case of ante-mortem inspection it is suggested that consideration should be given to the need for OVs to continue to undertake this role in all instances. It is suggested that consideration is given to the possibility of appointing experienced individuals, who may not necessarily be veterinarians, to undertake ante-mortem inspections where considered appropriate. This has the potential to deliver many benefits both operational and financial without compromising the high standards of animal welfare that the industry expects.

### **Q3. How effective is the relationship between the Meat Hygiene Service and the industry?**

HCC has regular contact with FBOs, MHS Business Managers and FSA Wales. HCC considers that the changes made by the MHS in recent years have in general been well received by the industry. Industry has welcomed the reduction which has taken place over recent years in the cost of running the MHS. However, there remains a view amongst FBOs that there is further scope to explore ways of reducing the costs associated with the meat inspection service in abattoirs.

The MHS Transformation programme has reduced MHS costs in GB by £4 million in 2007/08 and by over £9 million in 2008/09. It is understood that further reductions of £8 million are planned for 2009/10. Charges for official controls are now based on the time taken but with all operators receiving a discount on the full costs of those official controls applied by MHS. These discounts are calculated on the basis of 2008/09 hours and throughput and assume that if the mix of hours and throughput remain constant, charges should not increase in 2009/10.<sup>2</sup>

HCC would like to see further steps taken to explore ways in which further efficiencies can be achieved, particularly in reducing bureaucracy and streamlining procedures, thereby ensuring the smooth running of plants without adversely affecting animal welfare or food safety.

It is well recognised that the majority of FBOs understand how high standards of animal welfare leads to high quality meat production and they work diligently to achieve this within their plants.

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<sup>2</sup> A Guide for Food Business Operators to MHS Charges for Official Controls (The Charges Guide) Effective from 28 September 2009

#### **Q4. Could the Welsh Assembly Government take further action to ensure the proper implementation of relevant legislation on meat hygiene and animal welfare in abattoirs and slaughterhouses in Wales?**

Legislation to protect consumers and animals must always be adhered to and HCC believes that the Welsh red meat industry conforms to the relevant legislation. Given that protection of the consumer is the primary concern this sector of the food industry is already highly regulated.

The *EU Regulation 1099/2009 on the Protection of Animals at the Time of Killing* is due to come into effect in January 2013.<sup>3</sup> The regulation which was published in November 2009 includes a number of changes to current European welfare rules. It is important that the red meat industry in Wales is consulted on the legislation to implement the regulation.

HCC is offering support to small and medium sized enterprise (SME) processors to develop and improve their in-plant systems. The benefits of this will be that FBOs will have effective, well organised systems thus ensuring the quality and safety of food products. This support is being provided by HCC under the Rural Development Plan for Wales 2007 – 2013 which is financed by the Welsh Assembly Government and the European Agricultural Fund for Rural Development (EAFRD).

MHS meat hygiene and animal welfare at slaughter charges (official controls charges) to FBOs are required by the finance provisions set out in Articles 26 and 27 of Regulation (EC) No. 882/2004. These provisions came into force in law from 28 September 2009 under *The Meat (Official Controls Charges) (Wales) Regulations 2009*.<sup>4</sup>

The primary responsibility of the FSA and a core principle since its inception in 2000 is to provide the best possible protection for UK consumers from risks which may arise from food. The costs of running the MHS and its activities in 2008-2009 were £77.9 million. In April 2009 the FSA Board agreed to a timescale to 2014/15 for reducing the MHS subsidy for the industry in GB to £10 million. However, in November 2009 the FSA Board agreed that protecting the consumer should not be based on changed economic circumstances or the ability of an industry to pay. The FSA Board also agreed that providing a subsidy to businesses is inconsistent with the role of a regulator; and that it is not a function of the FSA to subsidise industry and if a continuing subsidy is to be provided it should come from elsewhere. The FSA has also stated that it has no remit within its constitution to subsidise private businesses. The FSA Board has not ruled out the money coming from elsewhere such as from central Government. The FSA Board has also agreed that FSA should consult with industry and government stakeholders on proposals for implementing the above strategy.<sup>5</sup>

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<sup>3</sup> Official Journal of the European Union COUNCIL REGULATION (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing

<sup>4</sup> A Guide for Food Business Operators to MHS Charges for Official Controls (The Charges Guide) Effective from 28 September 2009

<sup>5</sup> FSA Board Open meeting 10 November 2009 paper FSA 09/11/06

HCC believes that the funding which is provided by the Welsh Assembly Government to the FSA to discount the cost of meat hygiene charges is of vital importance to the red meat industry in Wales.

HCC also considers it important that as proposed there is full engagement in this FSA consultation by stakeholders at both an industry and government level. This will provide various options to be explored, including the opportunity for the Welsh Assembly Government and other Devolved Administrations to consider the most cost effective ways of delivering public protection; meeting the compliance requirements of relevant legislation; whilst allowing food businesses to operate in a sustainable way.