

BVA and AGV response to FSA consultation on early proposals for a future delivery model for FSA-delivered official controls in the meat sector

Introduction

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The Association of Government Vets (AGV) is a specialist division of BVA representing the views of vets working in UK Government Departments and Executive Agencies.
3. We welcome this opportunity to submit views on early proposals for reform of FSA-delivered official controls in the meat sector. We recognise that the formulation of an outline future delivery model (FDM) is the first stage of reform activity, and we look forward to engaging further once aspects of the FDM have been worked up in more detail.

8. In our 2020 response to the EFRA Committee inquiry into labour in the food supply chain we highlighted existing reliance on non-UK graduates within the veterinary profession, pointing out that in the meat hygiene sector the reliance was particularly acute. At the time FSA estimated that 95% of the veterinary workforce in abattoirs had graduated overseas, with a clear majority coming from the EU. We were clear that losing these OV's from slaughterhouses would increase the risk of food fraud, provide potential for animal welfare breaches, and jeopardise consumer confidence.²
9. We subsequently gave evidence to the EFRA Committee and, in December 2020, welcomed the report which outlined the essential role of veterinary surgeons throughout the food chain and noted the increased pressures on veterinary capacity which would be seen at the end of the Brexit transition period.³
10. However, recognition of the problem is only the first step towards a solution and most recently, we have seen Defra progress contingency plans by asking RCVS to admit vets with IELTS level 5 to the temporary register for the purposes of bolstering veterinary capacity for the delivery of official controls. Although the proposal caused some concern that it could represent a lowering of standards, in consultation with our Policy Committee we took the view that it would be inappropriate to oppose a plan which was a contingency measure designed to tackle the FSA workforce deficit. Instead, we supported the proposal with the caveat that it should not lead to a two-tier system and that longer-term there must be innovative solutions found to develop the current model and improve reward and recognition.

Benefits of the proposed Future Delivery Model

11. The proposed FDM represents a real opportunity to develop a long-term strategy for tackling the human resource issues at FSA. The approach must ensure that veterinary expertise is utilised in a way that ensures real-time improvements to animal welfare and food safety as well as contributing to systemic changes both within the FBO and on farm through better use of data. The veterinary role in supporting and protecting animal health and welfare is critical, and this must remain at the heart of any new model. More widely, the FDM must also be accompanied by a wholesale change in the way undergraduates are taught veterinary public health, and it could be useful to look at the approach taken in some EU countries.

Objectives of the proposed Future Delivery Model

12. We broadly support the proposed objectives of increasing compliance, enabling business growth, and increasing consumer confidence. However, it is unclear from the consultation paper the extent to which animal welfare improvement is also a driver for the proposed FDM. The programme must ensure that high animal welfare outcomes remain a key focus and that the new model facilitates and encourages FBOs to work with OV's to prioritise animal welfare and shift from seeing regulation as a tick-box exercise. This should be clearly stated in the principles.
13. A sustainable workforce should also be included as an objective for the FDM. Well-supported employees, who are properly remunerated for their professional skills and expertise, as well as provided with clear career pathways should be a key goal, with improved retention as a measure.

² https://www.bva.co.uk/media/3616/bva-response-to-efra-committee-labour-in-the-food-supply-chain_final.pdf

³ <https://www.bva.co.uk/news-and-blog/news-article/mps-recognise-critical-vet-shortages-as-end-of-transition-looms/>

Principles and key elements of the Future Delivery Model

14. We broadly support the seven principles which have been identified by the OTP as the key components required to deliver the desired transformation within the FSA and broader regulatory environment. Animal welfare must be explicitly stated and could reasonably be
15. We also broadly support the key elements of the proposed future delivery model, although there are some areas where additional detail or clarification could be provided, summarised below.

Clearer accountability

16. We strongly support the principle of ensuring clear accountability and agree that a stronger collaborative relationship between FSA and FBOs should increase

considered carefully in order to avoid unintended consequences. For example, publication of information relating to repeat stunning, which is a technical non-compliance rather than an animal welfare non-compliance, could be easily misunderstood by retailers and

attraction for OVs as highly skilled professionals, we agree that it is essential for the right people with the right qualifications to be deployed in the right roles where real added value can be realised.

26. Having an influence on animal health and welfare is an important aspect of job satisfaction for many vets. OVs delivering official controls should feel empowered to make a difference to animal health and welfare through their work, both within the abattoir setting but also at a farm level. Opportunities to work more closely with supplier farms and their vets could bring about animal welfare improvements across the food chain and contribute to increased job satisfaction and therefore retention.
27. Although awareness of the OV function delivering official controls is high, the role is still not attractive to the majority of vets. Whilst there is more that can be done to promote the value of the role, without appropriate remuneration to make the role financially attractive, particularly for recent graduates entering the profession with significant student debts to pay, recruitment and retention will remain an issue. As we recognise in our position on good veterinary workplaces⁷, remuneration can be described as a hygiene factor, as, provided a

any system that would introduce two standards of production, processing or certification for domestic and export markets because of the increased risk of food fraud, animal welfare compromises and damage to public health guarantees.

32. The FSA consultation document emphasises that there is no planned reduction in domestic standards, however, this does not represent a guarantee that such proposals will not be