

Summary of responses to Meat Hygiene Service (MHS) consultation on proposed changes to veterinary supervision arrangements within the MHS

Consultation issued: 11 April 2006

Consultation closed: 7 July 2006

Background

1. On 11 April 2006, a 12-week public consultation was launched seeking stakeholder views on MHS Management Board proposals to enhance veterinary supervision arrangements. The consultation covered England, Scotland and Wales and was issued to 141 external stakeholders. Views on proposals were also encouraged from MHS staff. To reach a wider stakeholder base, the consultation was made available on the FSA Website (<http://www.food.gov.uk/>).
2. Included in the consultation package was the MHS Management Board paper 'Veterinary Supervision Arrangements within the MHS', which was approved for consultation by the MHS Board, and the July 2005 report by DNV Consulting 'Review of options for provision of Veterinary Surgeons within the Meat Hygiene Service'. These succeeded other reports on the MHS, such as the Wall report and an initial report by DNV Consulting. Of five possible alternatives originally envisaged by the FSA and MHS, the FSA identified three options to be taken forward in the second of the DNV reviews – an enhanced contractor system; a fully employed competent authority system and a hybrid system. These were considered further by the MHS Management Board in its paper.
3. At the current time, around 92% of Official Veterinarians (OVs) are currently supplied to the MHS through veterinary contractors. The consultation invited views on the MHS Management Board's preferred option for change, as detailed below.
 - For the immediate future, and as a first step, veterinary supervision arrangements in the MHS to be based on an enhanced hybrid system (Option 5 of the MHS paper), with:
 - veterinary contractors continuing to provide OVs in slaughterhouses and game handling establishments, but with technical management and supervision provided by MHS employed Area Official Veterinarians (AOVs);
 - audits of Food Business Operators' food safety management systems in slaughterhouses and game handling establishments (and at co-located cutting plants) continuing in most cases to be undertaken by the OV responsible at these premises, supervised by the AOV.
 - AOVs will carry out audits in most stand-alone cutting plants and will have ultimate responsibility for the standard of official controls in *all* establishments subject to veterinary control;
 - a re-alignment of the Regional Veterinary Adviser (RVA) role within the organisation to better meet business needs, with resources transferred

- either to the new AOV role or to the Veterinary and Technical Support Unit (VTSU), for the provision of supervision, enhanced instructions, advice, training and support; and
- the establishment of a clear veterinary and technical reporting line within the organisation to the MHS Veterinary and Technical Director and in turn to the FSA Veterinary Director and the Government's Chief Veterinary Officer.
- A longer term aim to move to a largely employed OV workforce (with an OV employed level of 40-50%) (Option 4 of the MHS paper), with a further review of requirements by the end of 2007.

Summary

4. A total of 37 responses were received:
 - 12 from MHS staff and contract / self-employed OVs
 - 12 from veterinary contract holders / veterinary organisations
 - 12 from food producers, meat trade and consumer organisations
 - 1 from LACORS (Local Authorities Coordinator of Regulatory Services).
5. Responses to the specific questions asked in the consultation are summarised in the table in **Annex A**. However, the summary should not be viewed as exhaustive, particularly as many respondents chose not to answer the specific questions directly.
6. Two of the respondents asked that their personal details not be published. Their details have not been included in the table, although their responses have been taken into account and are consistent with other views expressed.

Next steps

7. In light of responses to the public consultation exercise, further work carried out on the resource and cost implications of the proposals in the consultation and wider discussions taking place outside the consultation, careful consideration is being given to next steps for enhancing the delivery of official controls in approved meat premises through changes to the veterinary structure.
8. A report on next steps will be published later in the year and will be made available on the FSA Website.

Meat Hygiene Service
3 October 2006

Table summarising responses to MHS consultation on proposed changes to veterinary supervision arrangements

<p>Question i) Stakeholders are asked to consider the proposed changes to veterinary supervision arrangements within the MHS in the short-term (Option 5 of the MHS report). Views are invited on whether the proposed changes would meet the recommendations of the Wall report and the requirements of the IAG by providing direct veterinary / technical supervision and also to deliver business needs.</p>	
Adrian Thorne, MHS RVA	Supports general principle of Option 5.
Alistair Hamilton, MHS AOV	Does not specifically answer question, but seems to support the creation of AOVs, with the career structure – Official Veterinarian (OV) -Area Official Veterinarian (AOV) -Veterinary Adviser (VA) - Verification and Audit Unit.
Anseris	Does not specifically answer this question.
Antonio Valcarce, MHS AOV	Does not specifically answer this question.
Association of Independent Meat Suppliers (AIMS)	No response.
Avenue Veterinary Centre	Does not specifically answer question.
British Meat Processors' Association (BMPA)	Supports this option, but only as an interim measure, pending further assessment of additional options.
British Poultry Council (BPC)	Strongly opposes the enhanced hybrid option. BPC note that the failings which led to the Wall Report and the IAG Report occurred in red meat plants and not poultry meat plants, and that the failings were in connection with regulations applying specifically to large-animal disease risks and associated controls. None of this applied to poultry, or its slaughter and inspection, so BPC feel that radically changing the system of poultry supervision will do nothing to meet the recommendations of the Wall report and the requirements of the IAG.

<p>Question i) Stakeholders are asked to consider the proposed changes to veterinary supervision arrangements within the MHS in the short-term (Option 5 of the MHS report). Views are invited on whether the proposed changes would meet the recommendations of the Wall report and the requirements of the IAG by providing direct veterinary / technical supervision and also to deliver business needs.</p>	
British Veterinary Association (BVA) / Royal College of Veterinary Surgeons (RCVS)	Seem to support this option in principle, but do not state this categorically. Acknowledge the scope of the changes and feel that the timescales are ambitious, so the interim option would be in place for longer.
Collin Wilson, MHS RVA	Broadly supports the principle of the AOV role. Concerned that a large increase in AOV numbers will lead to a large increase in costs.
Eville and Jones	Suggest that this option be rejected, as it will not meet the recommendations.
Fenton Veterinary Practice	Thinks that Option 5 will theoretically meet the recommendations of the Wall report and IAG requirements. However they also believe that the proposed system is not designed to the issue of improving the quality of the new, inexperienced OV, but is designed to take account of the inadequacies of these OVs.
Food Consultancy & Inspection Ltd (FCI)	Notes that neither Wall nor IAG recommend direct veterinary supervision by the MHS. Reject this option, citing lack of thorough/accurate costings as a significant factor. Does not feel it addresses the root of the problems highlighted in the reports.
Foodaware	Welcome the proposals as they strengthen veterinary supervision and provide much needed support for OVs working in abattoirs and meat cutting plants. In principle, they believe this option is pragmatic, realistic and desirable in the interest of the public.
Forum of Private Businesses	Does not specifically answer the question.
Frances Moreno, AOV	Does not specifically answer the question.
Hall Mark Meat Hygiene Ltd	Disagrees with the proposals as they feel it would fundamentally undermine the positive results that can be achieved by contractors. They stress negative implications for OV supervision, OV retention, and they also believe that the cost-effectiveness of this proposal has been overestimated.
John Maddox, SMHI, MHS	Believes that the interim arrangement of AOVs, contractors and contractor OVs could be unwieldy, expensive and a step back to the days of Principal Official Veterinary Surgeons (POVSs).

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Local Authorities Co-ordinators of Regulatory Services (LACORS)	LACORS support the introduction of Area Official Veterinarians within the MHS.
Meat and Livestock Commission (MLC)	Believe that the proposed changes to veterinary supervision arrangements within the Meat Hygiene Service should meet the recommendations of the Wall report and the requirements of the IAG through providing direct veterinary / technical supervision and should also deliver business needs if an adequately resourced and competent management system is in place.
MHS Veterinary Verifiers	Fully support option in principle. Does not specifically answer question.
Mount Services	Favour the enhanced contractor model for long term solution, as feel it could produce the best outcome in terms of flexibility, value for money in the longer term, and with the right organisational structure, would address the concerns of the Wall report in terms of technical delivery.
National Farmers Union (NFU)	Does not specifically answer the question.
Nick Norman, MHS RVA	Does not specifically answer the question.
Norman Leslie, former OVS	Believes that option 5 is the correct option for short term.
Pipers Farm	Feels that Option 5 is flawed, as it resembles the current situation too closely; specifically the utilisation of contract Inspecting OVs who have poor language, technical and clinical skills, and are therefore unable to deliver the effective and safe service that the industry requires. They believe that failures already identified in the current system will be perpetuated under this new system and therefore the plan by FSA and MHS to move to option 4 must happen sooner than the end of 2007, as currently planned.
Raquel Luque, OV	Does not specifically answer then question. Seems keen to move immediately to the Employed option.
Robert Young, MHS AOV	Agrees with the interim option.

<p>Question i) Stakeholders are asked to consider the proposed changes to veterinary supervision arrangements within the MHS in the short-term (Option 5 of the MHS report). Views are invited on whether the proposed changes would meet the recommendations of the Wall report and the requirements of the IAG by providing direct veterinary / technical supervision and also to deliver business needs.</p>	
Sarah Kitwood, OV	Does not seem to think the proposed changes would meet the recommendations of the Wall report and the requirements of the IAG providing direct veterinary/technical supervision and also to deliver business needs.
Scottish Association of Meat Wholesalers (SAMW)	Supports this option, but only as an interim measure, pending further assessment of additional options.
Scottish Consumer Council	No response.
The Royal Environmental Health Institute of Scotland	No response.
Tulip Ltd	Does not specifically answer this question.
Veterinary Public Health Association (VPHA)	Does not answer the question, but rejects all of the proposed options.

Question ii) We encourage feedback from industry representatives on the effectiveness of the measures in place at establishments processing OTM animals for human consumption, for which the Area Official Veterinarian role has already been introduced, with corresponding technical management and supervision.	
Adrian Thorne, MHS RVA	Does not believe that the AOV should be part OV and part technical manager, with the AOVs also carrying out audits and enforcements. Also unconvinced that the success of OTM so far will translate into similar success with risk-based hygiene enforcement.
Alistair Hamilton, MHS AOV	Does not specifically answer the question.
Anseris	Does not specifically answer the question.
Antonio Valcarce, MHS AOV	Does not specifically answer the question.
Association of Independent Meat Suppliers (AIMS)	No response.
Avenue Veterinary Centre	Does not specifically answer the question.
British Meat Processors' Association (BMPA)	No response.
British Poultry Council (BPC)	Does not specifically answer the question – this issue does not affect the Poultry council.
British Veterinary Association (BVA) / Royal College of Veterinary Surgeons (RCVS)	Believes that the introduction of AOVs for the OTM scheme worked well because they made regular visits to plants and kept in touch with the Official Veterinarians for whom they were responsible, mirroring POVSSs, before being replaced by RVAs. Concerned that lack of contractor contact will cause a lack of support and guidance, and that the AOVs will be too remote to fulfil this function.
Collin Wilson, MHS RVA	Does not specifically answer the question.
Eville and Jones	Acknowledges the successful implementation of the OTM rule change, but suggest it came about as a direct result of well structured and implemented FSA policy, rather than AOV intervention, backing up their opposition to all of the proposed options.
Fenton Veterinary Practice	Does not specifically answer the question. However, believes that once measures for processing OTM are proven to be effective the AOV will be more available to provide assistance and supervision to OVs.

Question ii) We encourage feedback from industry representatives on the effectiveness of the measures in place at establishments processing OTM animals for human consumption, for which the Area Official Veterinarian role has already been introduced, with corresponding technical management and supervision.	
Food Consultancy & Inspection Ltd (FCI)	Does not specifically answer the question.
Foodaware	Believes that the proposals strengthen support for OVs in processing the OTM rule change.
Forum of Private Businesses	Does not specifically answer the question.
Frances Moreno, AOV	Does not specifically answer the question.
Hall Mark Meat Hygiene	Believes that the introduction of AOVs has been effective in terms of the specific outcomes defined for the OTM project, however they do not believe it is valid to draw the conclusion that the AOV role can achieve the same level of success in the proposal to replace the current system of contractors.
John Maddox, MHS SMHI	Does not specifically answer the question.
Local Authorities Co-Ordinators of Regulatory Services (LACORS)	Does not specifically answer the question.
Meat and Livestock Commission (MLC)	Does not specifically answer the question.
MHS Veterinary Verifiers	Does not specifically answer the question.
Mount Services	Does not specifically answer the question.
National Farmers Union (NFU)	Does not specifically answer the question.
Nick Norman, MHS RVA	Does not specifically answer the question.
Norman Leslie, former OVS	Does not specifically answer the question.
Pipers Farm	Believes that as the DNV Consulting report was published before the EU Food Hygiene legislation and the OTM rule change commenced, the report has heightened the risks in changing to the fully employed competent authority system. Now they have been operational for some months they suggest the FSA to move to adopt option 4 sooner than planned.
Raquel Luque, OV	Does not specifically answer the question

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Robert Young, MHS AOV	Does not specifically answer the question.
Sarah Kitwood, OV	Does not specifically answer the question.
Scottish Association of Meat Wholesalers (SAMW)	No response.
Scottish Consumer Council	No response.
The Royal Environmental Health Institute of Scotland	No response.
Tulip Ltd	Does not specifically answer the question.
Veterinary Public Health Association (VPHA)	Does not specifically answer the question.

<p>Question iii) With reference to considerations in DNV Report 2 and the MHS report, views on the proposed new veterinary structure, change in responsibilities and establishment of a clear veterinary and technical reporting line would be appreciated.</p> <p>In particular, would the proposed changes help ensure that consistent policies are in place, decisions are taken at the correct level and with appropriate authority?</p>	
Adrian Thorne, MHS RVA	Concerned that the preferred options could result in a lack of clear management between AOVs and OVs.
Alistair Hamilton	Does not specifically answer the question, but thinks that full responsibility for line management should rest with the MHS.
Anseris	Does not specifically answer the question.
Antonio Valcarce	Does not specifically answer the question.
Association of Independent Meat Suppliers (AIMS)	No response.
Avenue Veterinary Centre	Does not specifically answer the question.
British Meat Processors' Association (BMPA)	No response.
British Poultry Council (BPC)	Does not specifically answer the question.
British Veterinary Association (BVA) / Royal College of Veterinary Surgeons (RCVS)	Believes that the proposed changes may help in this area, but only if the right people are appointed as Area Official Veterinarians. A formal specification of roles and responsibilities will be necessary but will not be enough on its own to make a difference.
Collin Wilson, MHS RVA	The management of the Veterinary Adviser group from the Veterinary and Technical Directorate is a good idea, as long as the expertise remains available to the Regional Director and Regions as needed.

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Eville and Jones	Does not feel that the proposed changes will help ensure that consistent policies are in place, or that decisions are taken at the correct level and with appropriate authority. In particular, they feel that the introduction of AOVs as part of the fully employed option will result in a confused, multi-tiered and duplicative system, with more complex lines of communication and responsibility. It is suggested that this system does not provide a direct line of command from the Veterinary and Technical Director, and continues to provide a duplicate method of management through the Area Manager and AOV with further duplication at plant level with inspecting, area and audit OVs all potentially performing differing levels of official controls.
Fenton Veterinary Practice	Believes that the proposed changes will provide constancy of policy and decision taking. They stress concern that these will not be communicated to the people on the ground i.e. OV, ESMHI, MHI
Food Consultancy & Inspection Ltd (FCI)	Believes that the proposed changes will not ensure consistent policies are in place, in light of the fact that MHS policy decisions are made centrally from Defra and FSA decisions. However they see the need for improvement in the timeliness and communication of decisions, through empowerment and cultural change in local teams. Regarding the appropriate authority for decision making, they suggest that the MHS be less prescriptive, except of key issues, allowing professional judgement and decision making at a local level.
Foodaware	Believe that the proposed changes should help ensure that consistent policies are in place and decisions are taken at the correct level. Note that decision making needs clarification about what are requirements of EU or UK law, and where professional judgement can be exercised.
Forum of Private Businesses	Does not specifically answer the question.
Frances Moreno, AOV	Does not specifically answer the question.

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Hall Mark Meat Hygiene	<p>Believes that without Contractor OV Team Leaders covering the area and continually discussing the correct implementation of instructions, consistency of application will deteriorate. However they feel that inconsistencies in application of instructions between MHS regions could be improved by a direct line to a central body at the Veterinary and Technical Directorate. Also suggest that a smaller number of contractors would help consistency (variant of control body option) as it would reduce the number of communication points required by the MHS and utilise the communication networks of the contractors.</p> <p>In terms of decisions, they do not believe that the proposal would result in the necessary culture to enable OV authority to make the right decisions at the plant. They also believe it would have a negative effect on OV behaviour.</p>
John Maddox, MHS SMHI	Does not specifically answer the question.
Local Authorities \Co-ordinators of Regulatory Services (LACORS)	Believe that the introduction of AOVs will help improve communication at regional and local levels, engagement with delivery partners and the resolution of issues at a local, regional or national level, as appropriate. Also think this will help develop consistency and best practice.
Meat and Livestock Commission (MLC)	Does not specifically answer the question.
MHS Veterinary Verifiers	Does not specifically answer the question.
Mount Services	Does not specifically answer the question.
National Farmers Union (NFU)	Does not specifically answer the question.
Nick Norman, MHS RVA	Does not specifically answer the question.
Norman Leslie, former OVS	Does not specifically answer the question.
Pipers Farm	Does not specifically answer the question.

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In particular, would the proposed changes help ensure that consistent policies are in place, decisions are taken at the correct level and with appropriate authority?	
Raquel Luque, OV	Does not specifically answer the question.
Robert Young, MHS AOV	Does not specifically answer the question.
Sarah Kitwood, OV	Believes that the introduction of the AOV role will have a negative impact on decision making and consequently on public health, animal welfare and notifiable diseases.
Scottish Association of Meat Wholesalers (SAMW)	No response.
Scottish Consumer Council	No response.
The Royal Environmental Health Institute of Scotland	No response.
Tulip Ltd	Believes the introduction of the AOV role can ensure consistent application of regulations throughout a region, but would need further work to get consistent application nationwide.
Veterinary Public Health Association (VPHA)	Does not answer the question.

Question iv) We recognise that the proposed changes in the short-term, will affect those businesses supplying Official Veterinarians under contract. A notable difference would be the transfer of responsibility for technical decisions made by the Official Veterinarian from the contractor to the MHS. DNV Report 2 recognised that such a move would result in a major change to the role of the larger contractors to that resembling a specialist employment agency, and would require a new tendering process and change to contract arrangements.

These changes must also be coupled with the implications of the two recent change programmes on Official Veterinarian attendance levels – the implementation of the EU Food Hygiene legislation and the OTM rule change – with the former presenting the opportunity for reduced Official Veterinarian attendance levels in certain slaughterhouses and game handling establishments, on the basis of risk-analysis.

We would appreciate comments from Official Veterinarian contract holders on the impact of the change to veterinary supervision arrangements to their businesses. Will you tender to provide veterinary services in the short-term (for 1 May 2007)? What about options for the longer-term, in the event that the MHS moves more to a fully-employed Official Veterinarian workforce?

Adrian Thorne, MHS RVA	Does not specifically answer the question.
Alistair Hamilton	Does not specifically answer the question.
Anseris	Does not specifically answer the question.
Antonio Valcarce	Does not specifically answer the question.
Association of Independent Meat Suppliers (AIMS)	No response.
Avenue Veterinary Centre	Believes that the proposed changes would make tendering less appealing to the smaller private practise contractor, which would have a detrimental impact on the MHS service. Short term contracts will lead to increased industry costs and staffing costs.
British Meat Processors' Association (BMPA)	No response.
British Poultry Council (BPC)	Does not specifically answer the question.

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British Veterinary Association (BVA) / Royal College of Veterinary Surgeons (RCVS)	No response for this question.
Collin Wilson, MHS RVA	Does not specifically answer the question.
Eville and Jones	Does not specifically answer the question.
Fenton Veterinary Practice	<p>Thinks that the prospect of having to “fill the gap” for a short period (e.g. 18 months), with the likelihood of losing contracts or parts of contracts will not encourage contract providers to tender for May 2007, and it would incur employment issues and potential costs for business of all sizes.</p> <p>Also believes that large animal veterinary practices will not be encouraged to tender for economic reasons (note: they believe the costings used by DNV in its report were not realistic, as veterinary fees have moved on significantly). Suggest that OV remuneration would have to at least be in line with LVI fees which are already considered to be too low by most members of the profession.</p>

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Food Consultancy and Inspection Ltd (FCI)	Deem it impossible to judge whether they will tender in 2007, or longer term, until a clear specification is put forward, though it is noted that there is little of a value added nature for contractors to supply.
Foodaware	Does not specifically answer the question.
Forum of Private Businesses	Does not specifically answer the question.
Frances Moreno, AOV	Does not specifically answer the question.
Hall Mark Meat Hygiene	Consider the Employment Agency role unattractive (less interesting and unrewarding), due to a lack of provision of a fully managed service. Also raised concerns about increased technical pressure and increased costs and fees. They are unlikely to remain in the industry to provide a reduced level of service and if they continue to be targeted in order to find cost savings. However, assuming Employed OVs would not be allocated the plants where Contractors are working well, they would welcome fair competition from an MHS employed OV service, providing a fair playing field is achieved with Employed OVs bidding for plants against Contractor OVs and action taken against failing OV service providers, either employed by the MHS or by contractors.

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John Maddox, MHS SMHI	Does not specifically answer the question.
Local Authorities Co-Ordinators of Regulatory Services (LACORS)	Does not specifically answer the question.
Meat and Livestock Commission (MLC)	Does not specifically answer the question.
MHS Veterinary Verifiers	Does not specifically answer the question.
Mount Services	Suggest that few contractors would be likely to take up this work, with a potential risk of increased costings and fees.
National Farmers Union (NFU)	Does not specifically answer the question.
Nick Norman, MHS RVA	Does not specifically answer the question. For details of his suggestion on how to enhance the AOV role, refer to answer for Question i).
Norman Leslie, former OVS	Does not specifically answer the question.
Pipers Farm	Does not specifically answer the question.

Question iv) We recognise that the proposed changes in the short-term, will affect those businesses supplying Official Veterinarians under contract. A notable difference would be the transfer of responsibility for technical decisions made by the Official Veterinarian from the contractor to the MHS. DNV Report 2 recognised that such a move would result in a major change to the role of the larger contractors to that resembling a specialist employment agency, and would require a new tendering process and change to contract arrangements.

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Racquel Luque, OV	Does not specifically answer the question.
Robert Young, MHS AOV	Does not specifically answer the question.
Sarah Kitwood, OV	Does not specifically answer the question.
Scottish Association of Meat Wholesalers (SAMW)	No response.
Scottish Consumer Council	No response.
The Royal Environmental Health Institute of Scotland	No response.
Tulip Ltd	Does not specifically answer the question.
Veterinary Public Health Association (VPHA)	Does not answer the question.

<p>Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?</p>	
Adrian Thorne, MHS RVA	Proposes a smaller number of AOVs (e.g. one per area) with all of the routine audit and enforcement work carried out by Contractor OVs or Employed OVs.
Alistair Hamilton, MHS AOV	Suggested career structure: OV – AOV – Veterinary Adviser – Verification and Audit Unit – Veterinary and Technical Director. Teams should consist of Area Managers, Senior Meat Hygiene Inspectors, AOVs and OVs.
Anseris	Suggests enhancements to the way any new structure could be run, but no suggestions as to what the structure should be.
Antonio Valcarce, MHS AOV	<p>Suggested a new structure, based around the concept of self-contained Management Units, which will be directly responsible and accountable for the MHS delivery of official controls.</p> <p>Structure suggested is:</p> <pre> graph TD RD[RD] --> MUA[MANAGEMENT UNIT (MUA)] VA[VA] --> MUA subgraph MUA_Box [MANAGEMENT UNIT (MUA)] BA[BA] <--> AOV[AOV] end Audit[Audit] <--> MUA_Box MUA_Box <--> HR[HR] MUA_Box --> eOV[eOV] MUA_Box --> cOV[cOV] eOV --> eOAs1[eOAs cOAs] cOV --> eOAs2[eOAs cOAs] cOV -.- eOAs1 </pre>

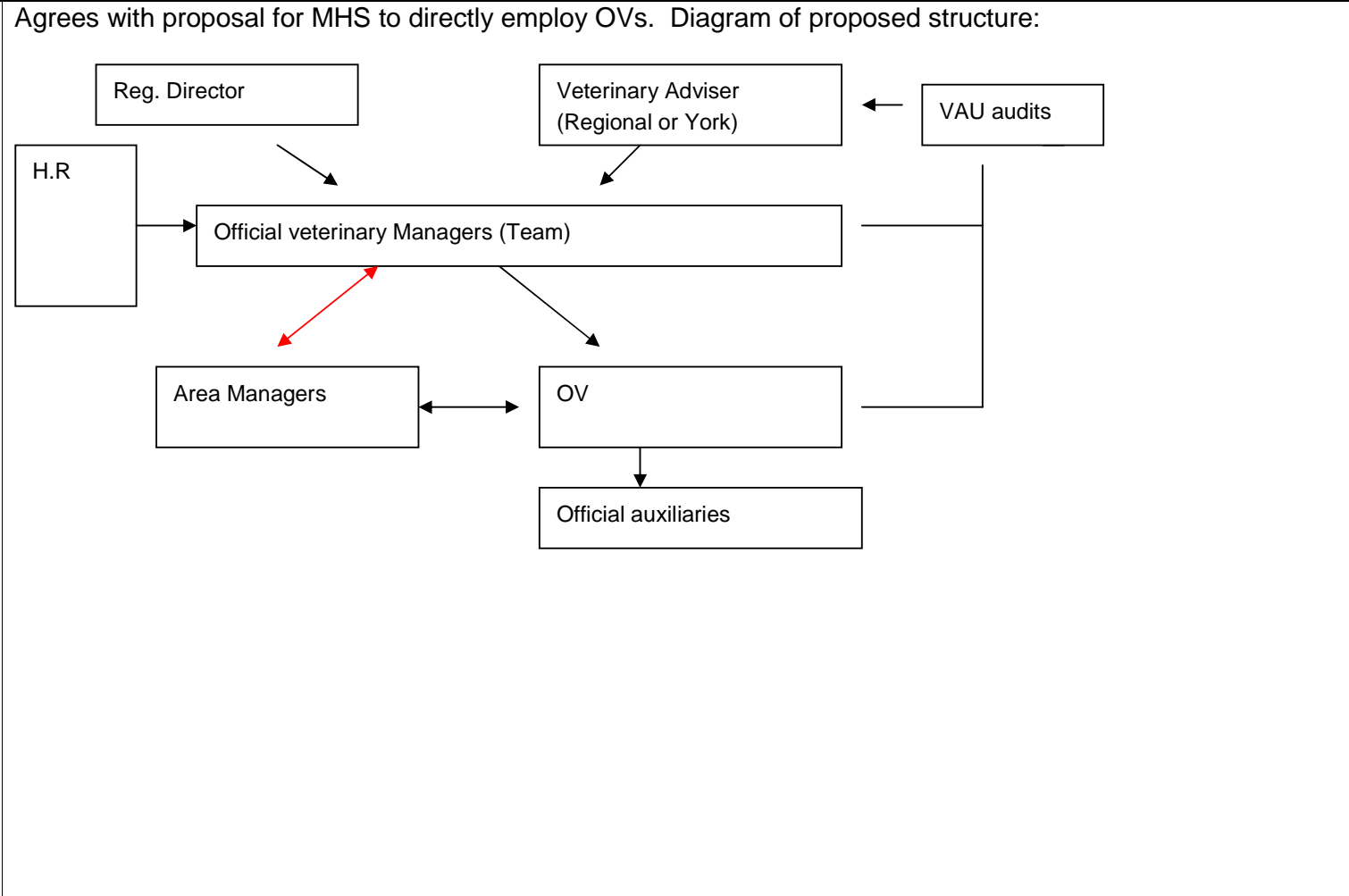
Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?	
Antonio Valcarce, MHS AOV (continued)	Key RD = Regional Director VA = Veterinary Advisor BA = Business Advisor eOV = Employed Official Veterinarian cOV = Contract Official Veterinarian eOA = Employed Official Auxiliary (also known as Meat Hygiene Inspector – MHI) cOA = Contract Official Auxiliary (also known as Meat Hygiene Inspector – MHI)
Association of Independent Meat Suppliers (AIMS)	No response. Indicated that a more radical assessment of MHS management and services is required.
Avenue Veterinary Centre	Does not specifically answer the question, but suggests they would be in favour of a partnering approach, where the contractor tenders for the provision of the whole service and an annual, fixed-fee basis. Believes that a long term partnering approach would be more beneficial in allowing commercial enterprises to confidently plan further ahead to provide the high quality service that the MHS demands.
British Meat Processors' Association (BMPA)	No response. Indicated that more radical assessment of MHS management and services is required.
British Poultry Council (BPC)	Does not specifically answer the question. Calls to explore more appropriate alternatives in conjunction with FSA. Seems broadly in favour of the control body system.
British Veterinary Association (BVA) / Royal College of Veterinary Surgeons (RCVS)	Support paragraph 6.6 of MHS paper: that “newly qualified and other veterinarians who have not developed audit and enforcement skills” might be used to carry out the OV inspection tasks, primarily ante mortem inspection, without taking on audit responsibilities. Pressure on experienced OVs could be relieved by bringing in suitable veterinary surgeons as inspection OVs; contract staff used by farm animal veterinary practices for this purpose. Another suggestion is that the State Veterinary Service provides an independent audit service for meat plants to reinforce the links between the primary producer and the abattoir. Alternatively a ‘Control Body’ system should be given more in-depth analysis for the long-term, where the Meat Hygiene Service concentrate on policy and audit, while handing over responsibility for ante mortem and post mortem inspection to an independent agency.

Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?	
Collin Wilson, MHS RVA	Notes that certain contractors have excellent management structures, and if this were to be applied as standard, the AOV role could be performed by the contractor at lower cost. On the basis that this change should be cost neutral, suggests using existing expertise but managing better through the contractor in a more formal way or via the AOV role externally. There will still be a need for a similar number of Veterinary Advisers because much of the current job is unrelated to managing staff and will not be diluted by the AOV posts. Current regional / field basis for Veterinary Advisers would need to continue (.e.g. local liaison with other agencies and enforcement bodies).
Eville and Jones	<p>This response suggests the Control Body method (with all meat inspection tasks delivered through limited numbers of private based delivery bodies, with the Competent Authority providing policy and then ensuring its correct implementation) would be the most practical solution in the long term, and expands upon this idea in some detail in the full response. Considers that this will resolve all of the problems identified in the Wall and DNV reports.</p> <p>Makes a number of short-term recommendations for change to improve MHS performance which are considered to be compatible with long-term suggestion including:</p> <ul style="list-style-type: none"> • Use of existing pool of AOVs and RVAs to provide technical support to contractor's own staff as required. • Provision of a functional unit within MHS Headquarters that can respond rapidly to satisfy technical queries from the field, ensuring that this team is sufficiently empowered to make operational guidance. • Enhance veterinary status and inclusion within the organisation. • Remove regional autonomy, with Headquarters focused operations unit driving national consistency. • Change the focus of MHS on to core inspection functions supported by the business. • Reduce the number of contractors, with ongoing rolling contracts that are performance based.
Fenton Veterinary Practice	Suggests using experienced OVs/lead OVs/practitioners who do not want direct MHS employment as contract AOVs, especially in remote areas or where AOVs are in short supply.

Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?	
Food Consultancy and Inspection Ltd (FCI)	<p>Unconvinced of MHS's ability to manage change of this magnitude (i.e. move to employed model).</p> <p>Suggest for the short to medium term solutions are offered, which empower MHS plant and local service delivery teams, whilst continuing to use contractors and hold them accountable for a fully managed service. Proposals include:</p> <ul style="list-style-type: none"> • Limit number of contractors. • Empower local service delivery teams. • Introduce penal sanctions for poor delivery. • Sequential tendering of 'clusters' of work, to keep contractors on their feet. • Better OV training and coaching. Teamwork training and splitting up inefficient teams. • Defined AOV/OV ratio. • Clear responsibility lines with OVs taking on operational and technical responsibility in plants. • Reduced regional management, area managers and MHIs. <p>Alternative solutions are offered for the medium to longer term which remove the FSA / MHS from frontline service delivery via the establishment of a limited number of control bodies that employ all operational staff. The FSA / MHS role would then focus largely on policy development and an audit function.</p>
Foodaware	Does not specifically answer the question.
Forum of Private Businesses	<p>Does not specifically answer the question, but raises the point that there should be one, single point of conference for businesses, stresses need for understandable lines of authority and suggest veterinary surgeons do not perform all routine inspection.</p> <p>Supports the Pipers Farm proposal.</p>

Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?

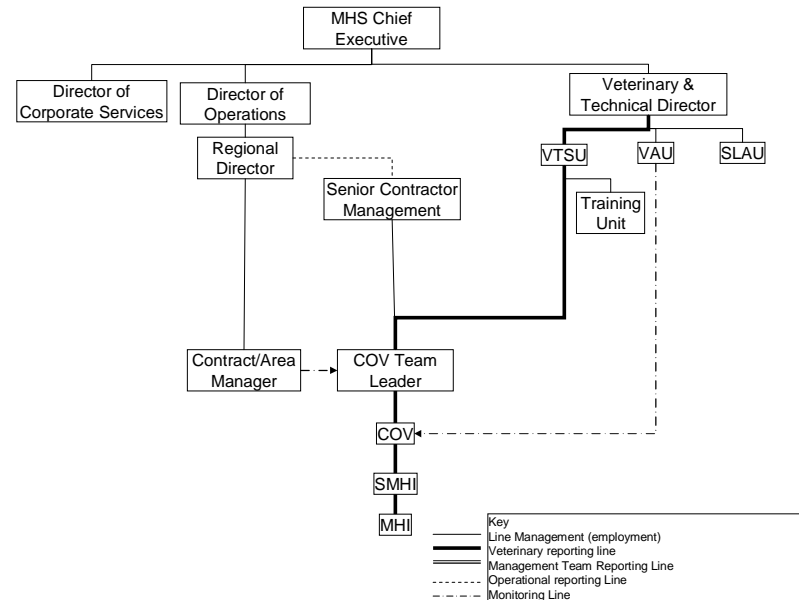
Frances Moreno, AOV



Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?

Hall Mark Meat Hygiene

Preferred option is control body, and they stress their ability to fill this role by taking on management of the whole of the plant team, OVs and MHIs in order to improve flexibility, communication, efficiencies and technical delivery. They acknowledge it may take some time to move to this structure. Proposed structure diagram:



In the interim, they would encourage better partnership working with MHS and contractors. This includes establishment of a veterinary technical management team, with senior vets from MHS and Contractors working together with a direct line to the Veterinary and Technical Directorate, ensuring consistent communication, effective plant enforcement priorities and retention of high quality OVs.

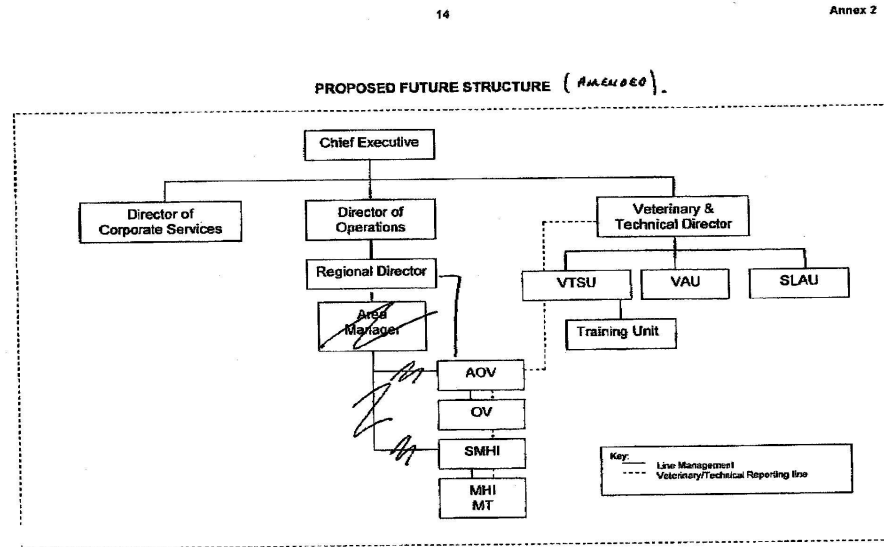
They disagree with the statement that the proposed short-term arrangements will not present additional costs to industry and have provided justifications to support their view.

Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?	
John Maddox, MHS SMHI	Suggests the removal of Senior Meat Hygiene Inspector or the OV role. The AOV would then directly manage Meat Hygiene Inspectors on technical matters; if the OV post was removed the AOVs would take on the enforcement role.
Local Authorities Co-ordinators of Regulatory Services (LACORS)	Does not specifically answer the question.
Meat and Livestock Commission (MLC)	Does not specifically answer the question.
MHS Veterinary Verifiers	Recommendations to improve structure: <ul style="list-style-type: none"> • Include the OV contractors in the organisational chart and make it clear what their line management role will be with respect to performance management. • Ensure all OVs are employed (unless there are exceptional reasons such as geographical location of establishments). • Improve proposed controls for the technical line management of AOVs. For example, employ a veterinary line manager in each region to fulfil this function. This will also leave Area Managers free to focus on other business management issues. • Improve proposed controls for technical performance management of MHIs, for example, give employed OVs overall responsibility for the MHIs performance management system, drawing on input from Senior Meat Hygiene Inspectors regarding business management issues such as attendance management, etc.
Mount Services	Suggest that RVAs, supported by a smaller number of AOVs, could assist contract staff with technical updating and feedback to the Veterinary and Technical Support Unit by monitoring OV performance and contractor support systems. Encourages more consideration to be given to the enhanced contractor option.
National Farmers Union (NFU)	Does not specifically answer the question.
Nick Norman, MHS RVA	Does not specifically answer the question, but believes that Regional Veterinary Advisers should work for Veterinary and Technical Directorate and be managed by someone of veterinary level.

Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?

Norman Leslie, former OVS

Supports interim and long term proposals. Proposed structure diagram:



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Pipers Farm

Supports move to fully employed system, with greater emphasis on the skills and abilities of S/MHIs.

Raquel Luque, OV

Supports a hybrid system with more Employed OVs and less Contractor OVs.

Robert Young, MHS AOV

Does not specifically answer the question

Scottish Association of Meat Wholesalers (SAMW)

No response. Indicated that more radical assessment of MHS management and services is required.

Sarah Kitwood, OV

Does not specifically answer the question.

Question v) Are there any other options for enhancing veterinary supervision arrangements in the MHS which are not included in the consultation paper, but which you would like to see considered before any final decisions are made?	
Scottish Consumer Council	No response.
The Royal Environmental Health Institute of Scotland	No response.
Tulip Ltd	Does not specifically answer the question.
Veterinary Public Health Association (VPHA)	Urges FSA to discuss more radical options for MHS reform. Support underlying proposal that all routine plant inspection tasks should be delivered by a single organisation, but feel that other options (e.g. control body proposal) should be considered for this alongside a fully employed MHS staff.