

**PROPOSED MHS PERFORMANCE TARGETS FOR 2002/03 – SUMMARY OF RESPONSES FROM ENGLAND, WALES AND SCOTLAND**

**ANNEX B**

1.	Association of Meat Inspectors GB Ltd (The)	Pierce T. Furlong , General Secretary	10.01.02	<p><b>Training –</b></p> <ul style="list-style-type: none"> <li>• Train meat inspection staff in HACCP and microbiological testing.</li> <li>• Provide training leading to formal qualifications in HACCP.</li> <li>• Provide proper training not simply in format of CPD modules based around subject area carried out in inspectors' own time.</li> </ul> <p><b>Efficiency–</b></p> <ul style="list-style-type: none"> <li>• Delegate some OVS tasks to meat inspection staff.</li> </ul> <ul style="list-style-type: none"> <li>• HACCP and microbiological testing to be carried out by enforcement officers rather than plant staff.</li> </ul>	<ul style="list-style-type: none"> <li>• This is already being addressed in current FSA / MHS project to implement the EU Commission decision on HACCP / micro-testing. MHS staff are being trained in the enforcement of the operators' responsibility to apply HACCP.</li> <li>• FSA agrees in principle and tasks are already delegated to meat inspectors where allowed within current legislative constraints. FSA negotiates on this basis in Brussels.</li> <li>• The fundamental principle of HACCP is that it is the operator who is responsible, not the enforcer.</li> </ul>
2.	British Meat Federation	P G Scott, Director	21.12.01	<p><b>General –</b></p> <ul style="list-style-type: none"> <li>• Annual review and adjustment implies falling standards and should be down to MHS.</li> <li>• Meaningless targets, dubious benefits, increased pressure on plant and MHS staff.</li> <li>• New targets / standards to avoid repetition “ratchet” upwards and lose credibility.</li> <li>• Best practice targets go beyond legislation. Goalposts move without perceivable business benefits and are unsupported by legal basis for implementation.</li> <li>• Draft 2002/03 targets – reflect basis of MHS and existing legislation, therefore have either already been achieved or are impossible to assess.</li> </ul> <p><b>Public Health Protection –</b></p> <ul style="list-style-type: none"> <li>• Removal of “zero tolerance” in relation to Clean Livestock Policy, Poorly Performing Plants, and SRM is probably more realistic.</li> </ul> <p><b>Animal Welfare –</b></p> <ul style="list-style-type: none"> <li>• Curious consumer benefit.</li> </ul> <ul style="list-style-type: none"> <li>• Blindingly obvious target – why include it?</li> </ul> <p><b>Staff Training -</b></p> <ul style="list-style-type: none"> <li>• Welcome.</li> </ul> <p><b>Diversity –</b></p> <ul style="list-style-type: none"> <li>• Remove. Internal issue. Presumably driven by political correctness.</li> </ul> <p><b>Customer Focus –</b></p> <ul style="list-style-type: none"> <li>• Regret absence of “Value for Money”. Less specific than 2001/02 “Value for Money / Efficiency” target, but probably more realistic. MHS assessment of own target is noted.</li> </ul> <p><b>Financial Performance –</b></p> <ul style="list-style-type: none"> <li>• Should be taken for granted. Little benefit either to meat plants or consumers.</li> </ul> <p><b>Efficiency –</b></p> <ul style="list-style-type: none"> <li>• Increased direct employment of veterinarians might well have advantages. Keep stakeholders informed of progress.</li> </ul>	<ul style="list-style-type: none"> <li>• FSA does not agree that targets are meaningless, or are impossible to assess.</li> <li>• Comments noted.</li> <li>• One critical non-compliance will fail target. Zero tolerance therefore effectively still applies.</li> <li>• Comment noted. Column heading on published target will read “Consumer Benefit / Interest” to reflect range of consumer appeal.</li> <li>• Majority of respondents support animal welfare target.</li> <li>• Diversity target required under Civil Service Reform Programme.</li> <li>• “Value for Money” to be added to published target heading as this is effectively the case.</li> <li>• Target to be assessed by FSA on the basis of a report produced by MHS.</li> <li>• Target required for all Government Departments.</li> <li>• MHS / FPIT to note comment.</li> </ul>
3.	British Pig Association	Marcus Bates, General Manager	03.01.02	No specific comments at this point.	
4.	Farm Animal Welfare Council	Richard Aram, FAWC Secretariat	11.01.02	<p><b>Animal Welfare –</b></p> <ul style="list-style-type: none"> <li>• Welcome strengthened means of assessment through critical and major non-compliances.</li> <li>• Few enforcement options for welfare infringements – consider range of enforcement tools to bridge gap between warning and prosecution.</li> <li>• Does target include assessment of welfare problems during transit (as identified at unloading)?</li> <li>• How are occurrences of such welfare problems recorded?</li> </ul> <p><b>Training –</b></p> <ul style="list-style-type: none"> <li>• Animal Welfare training should be a core element.</li> </ul>	<ul style="list-style-type: none"> <li>• DEFRA to review options and take legal advice.</li> <li>• Yes.</li> <li>• MHS staff record welfare problems in the day book; daily report; and monthly report, sent to DEFRA each month.</li> <li>• Is already a core element in OVS training before appointment.</li> <li>• MHS reviews training needs constantly and provides training as new elements arise.</li> </ul>

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5.	Halal Food Authority	Masood Khawaja, President	03.01.02	<ul style="list-style-type: none"> <li>Progress has been made in Animal Welfare, Clean Livestock Policy, Hygiene Requirements, Public Health Protection and Staff Training.</li> <li>Much to be achieved on SRM and OTM to contain potential BSE infectivity.</li> <li>Supports rolling forward of last year's targets to improve results.</li> <li>More scrutiny of halal meat trade to reduce problems in hygiene, quality and traceability.</li> </ul>	<ul style="list-style-type: none"> <li>Further, more specific information requested.</li> <li>Brought to attention of secretariat to Muslim Organisations Working Group.</li> </ul>
6.	Humane Slaughter Association	C W Maxon, Technical Director	11.01.02	<p><b>Animal Welfare (At Slaughter) –</b></p> <ul style="list-style-type: none"> <li>Need to ensure proper positioning of captive-bolt instruments, and of stunning electrodes and duration of application.</li> <li>Adequately powered cartridges in captive-bolt equipment. Minimum 200 volt output for electrical equipment.</li> <li>Minimum time between stunning and sticking.</li> <li>Scrutinise quality of sticking – sever both carotid arteries, use thoracic stick in place of neck-cut whenever possible.</li> </ul>	<ul style="list-style-type: none"> <li>All points of detail and not appropriate for high level target. DEFRA will consider and respond.</li> </ul>
7.	Meat and Livestock Commission	Martin Grantley-Smith, Head of Government Relations	04.01.02	<ul style="list-style-type: none"> <li>Supports some year-on-year continuation to allow trend analysis on progress.</li> <li>Clean Livestock Policy – less than 100% compliance not acceptable. Continued zero tolerance a better target, assuming it can be reached (as it should be).</li> </ul>	<ul style="list-style-type: none"> <li>Target is failed by one critical non-compliance. Therefore zero tolerance effectively still applies.</li> </ul>
8.	National Farmers' Union of Scotland	Richard Henton	16.01.02	<ul style="list-style-type: none"> <li>The targets appear to cover the principal issues of importance to the industry.</li> <li>Main concern is that the MHS provide an effective and cost efficient service</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted.</li> </ul>
9.	Royal Environmental Health Institute of Scotland	Tom Bell, Director of Professional Development	12.12.01	No comments.	
10.	RSPCA	John Avizienius, Senior Scientific Officer	08.08.02	<p><b>Animal Welfare -</b></p> <ul style="list-style-type: none"> <li>Have RSPCA concerns on most recent MHS Animal Welfare Survey been addressed? (e.g. many abattoirs have no trained animal welfare personnel or any written policies to ensure animal welfare at all times).</li> <li>Could Animal Welfare Survey be used to set targets?</li> <li>New target to redress shortfall of trained animal welfare personnel?</li> <li>How is animal welfare being assessed in plants with no trained animal welfare personnel?</li> <li>Need fail-safe device on head only electrical stunning.</li> </ul>	<ul style="list-style-type: none"> <li>All points of detail and not appropriate for high level target.</li> <li>DEFRA will consider and respond.</li> </ul>
11.	Scottish Association of Meat Wholesalers	Alan Stevenson	16.01.02	<ul style="list-style-type: none"> <li>Members fully support CLP. Though it is felt that some producers are reluctant to accept they are part of the foodchain.</li> <li>FSA could do more to consolidate CLP and encourage OVSs to play a more active part.</li> <li>Members fully support measures to improve standards in poorly performing plants.</li> <li>There is a perceived lack of co-ordination between operators and the MHS for the introduction of HACCP.</li> <li>Wish to see the corporate training strategy developed &amp; implemented and co-ordinated with the activities of the Meat Training Council in order to fully involve all areas of the industry.</li> <li>The delivering of an improvement in customer satisfaction re MHS work requires better communication.</li> <li>The industry supports the principle of increased numbers of directly employed vets.</li> </ul>	<ul style="list-style-type: none"> <li>FSA to consider further initiatives to promote, and update, the CLP, including to producers as part of the meat supply chain.</li> <li>MHS to note.</li> <li>Meat Training Council are always involved and consulted on training initiatives.</li> <li>Noted. MHS to take forward.</li> </ul>
12.	Scottish Landowners' Federation	Jonathan Hall, Rural Policy Adviser	07.01.02	<ul style="list-style-type: none"> <li>Supports the emphasis on outcomes relating to FSA objectives and the extension of the MHS performance targets to include efficiency improvements. Considers the measures will secure comprehensive consumer protection whilst ensuring Scottish producers carry no more financial burden than is necessary.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>
13.	UNISON	Ron Spellman, MHS National Convenor	02.01.02	<ul style="list-style-type: none"> <li>Broadly agree with most targets.</li> </ul> <p><b>Staffing Levels -</b></p> <ul style="list-style-type: none"> <li>Inadequate numbers of MHS inspectors to achieve targets.</li> <li>MHS has no verifiable method of calculating how many staff are needed in each plant. FSA / MHS refuse to implement findings of MHS study into MHS staff numbers necessary for inspection functions. Staffing levels vary between plants of roughly the same amount of work per hour. UNISON repeatedly makes this point.</li> <li>Not acceptable to allow OVS decisions on adequate staffing levels without OVS access to study (above)</li> </ul> <p><b>Diversity -</b></p> <ul style="list-style-type: none"> <li>Requires FSA to develop MHS diversity. What does this mean?</li> </ul> <p><b>Health &amp; Safety -</b></p> <ul style="list-style-type: none"> <li>Additional target needed on health and safety protection of MHS staff – no MHS employee to work at a speed or in any circumstances that may cause him / her injury.</li> </ul>	<ul style="list-style-type: none"> <li>Not appropriate for high level targets – for MHS management consideration and response as appropriate.</li> <li>Target requires MHS to develop its own action plan – a target required for all Government Departments as part of Civil Service Reform. e.g. includes Equal Opportunities.</li> <li>Not for high level target. For MHS to include in Business Plan.</li> </ul>
14.	The Welsh Consumer Council	Gail Arentsen	07.01.02	No comment.	

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