

# Optimisation of MHS Resources in Slaughterhouses

## Final Report

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## OPTIMISATION OF MHS RESOURCES IN SLAUGHTERHOUSES

### Summary

- The Optimisation Team (OT), comprising representatives of FSA, MHS and industry, visited 19 slaughterhouses in GB to review the causes of variations in the deployment of MHS resources.
- The OT applied the principle that optimisation of the use of MHS resources must not compromise protection of public health or animal health and welfare.
- The OT identified opportunities for more efficient use of MHS resources at most of the slaughterhouses it visited.
- All slaughterhouses have different factors influencing MHS resource requirements and will have different solutions to optimisation. Consideration of the findings of this report by FBOs and MHS should contribute to the elaboration of Business Agreements at each premises.
- Checks carried out by MHS for FSA and Rural Affairs Departments on Food Business Operator (FBO) compliance with TSE and SRM legislation were identified as a significant area for potential efficiency savings. The OT believes that the proportionality of each of these checks to public health risks should be challenged, and proposes consideration of a more risk-based approach through audit of FBO systems.
- Opportunities were identified for more effective use of MHS resources through actions of both MHS and FBOs alone
- Optimising use of MHS resources will be best realised by FBOs and MHS working together to achieve the most efficient working arrangements
- Opportunities were identified for more efficient use of MHS staff time through the development of systems for exchange of information between FBOs and MHS
- Optimisation of use of MHS resources represents a transfer of some business risk from MHS to FBOs. A more efficient MHS is likely to operate with less reserve, which may affect its capacity to react to unexpected circumstances.

### Background

1. In response to an initiative of the Executive of the Food Standards Agency, a joint FSA/MHS/industry team was set up to review the causes of variations in the deployment of MHS resources, and identify best practice and potential improvement opportunities for the MHS and Food Business Operators (FBOs) and FSA implementation of national measures or pilot projects.

The Optimisation Team (OT) comprised:

Kenneth Clarke, Veterinary Adviser, FSA

Asier Pagazaurtundua, Veterinary Manager, MHS  
Peter Boyes, Technical Manager, Dovecote Park – BMPA nominee

## Scope

2. The OT investigated options for optimising MHS operations and associated costs at a range of red meat abattoirs in GB by assessing MHS and FBO working practices.
3. The OT applied the principle that optimisation of the use of MHS resources must not compromise protection of public health or animal health and welfare.
4. During visits to selected abattoirs the OT assessed the MHS resource necessary to deliver official controls. The OT did not consider the total number of MHS staff required at the premises each day to provide this resource (i.e. to cover breaks from on-line tasks).
5. The OT is aware of the significance of Health and Safety issues and of the need to take these into account when considering staff resource requirements. Detailed consideration of H&S issues was not within the scope of the project, but will be part of the discussion and implementation of Business Agreements.
6. Although MHS is not responsible for the delivery official controls in Northern Ireland, where this is the function of DARD, FSA is the UK Competent Authority. The OT visited slaughterhouses in Northern Ireland to assess operational practices and consistency of standards throughout UK.

## Objectives

To seek to identify best practices and opportunities for optimising the use of MHS resources under the following categories:

- Application of flexibilities permissible under the current regulations.
- Flexibilities currently not permitted by EU legislation, but where changes to the legislation are deemed desirable – through national measures (medium term) or seeking to amend the Hygiene Regulations (long term).
- Operational efficiency
  - effectiveness of MHS working practices
  - FBO's working practices that impact on the efficiency of MHS staff deployment.
- MHS hours worked on non-statutory tasks. E.g. Identification of 'gold plating' of tasks performed due to customer requirements

# Method

See Appendix 1

# Findings

7. Before recording its detailed findings, the OT wishes to highlight its view that all slaughtering businesses are different and must be considered individually. Superficially similar businesses may have marked differences in factors including: source of livestock; class of animals slaughtered; hours of operation; customers; line layout; effectiveness of food safety management systems. These differences make each business unique and render direct comparisons invalid.

## OV tasks

### OV presence

8. The Hygiene Regulations require the OV to be present throughout ante- and post-mortem inspection, but enable the CA to adapt this approach such that the OV need not be present at all times during p-m inspection in slaughterhouses 'carrying out discontinuous slaughter' identified on the basis of a risk analysis (see Appendix 2).

9. The OT identified a number of premises, currently with full time OV presence, which it believes are likely to fulfil the risk analysis criterion in terms of the class of animals slaughtered, livestock procurement systems, effectiveness of FBOs' HACCP-based system and historical records of a-m and p-m inspection. We believe that there is an opportunity for MHS management to be more flexible in its interpretation of 'discontinuous slaughter' in the assessment of the eligibility of premises for application of the derogation for the OV not to be present at all times during p-m inspection.

#### Example

Cattle slaughterhouse killing only prime animals – all cattle consigned directly from farm from producers who are members of company's producer group. Low incidence of a-m and p-m findings with public health significance. FBO's traceability and food safety management systems assessed by OV audit and OT as very good.

#### Recommendation 1

For all slaughterhouses, assess eligibility for adaptation of the requirement for the OV to be present at all times during p-m inspection.

MHS

10. We believe that the prescription about OV presence contained in the EU Hygiene Regulations, and the concept of 'discontinuous slaughter' are flawed,

and note that these were opposed by UK during negotiations on the Regulations. The hours of a day or days of a week during which slaughter takes place are only minor factors amongst others that should be considered in an analysis of the risks at a slaughterhouse. We believe that an attempt should be made to amend the EU legislation to remove this constraint to the application of a risk based approach.

<p><b>Recommendation 2</b> Develop action plan to amend the prescriptive requirements of EU legislation relating to the presence of the OV at slaughterhouses.</p>	<p>FSA Industry</p>
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**11.** In order to benefit from the derogation about OV presence during p-m inspection, in addition to fulfilling the risk analysis criterion including effective food safety management systems, FBOs must have sufficient lairage capacity and be able to organise the delivery of livestock so that the times at which the OV is required to be present to carry out a-m inspection can be agreed with MHS. In addition, the slaughterhouse must have sufficient physical capacity and agreed procedures for storage of meat (and other relevant parts) until a final p-m inspection by the OV can take place.

<p><b>Example</b> Cattle slaughterhouse with modern, high capacity lairage – prepared to commit to having day’s kill delivered to the lairage before 1000 a.m. P-m inspection records indicate infrequent need to detain carcasses. Sufficient capacity detained room.</p>
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<p><b>Recommendation 3</b> Consider lairage capacity and pattern of livestock arrival to enable MHS to adapt the requirement for the OV to be present at all times during p-m inspection, where risk factors permit.</p>	<p>FBOs</p>
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**12.** Some FBOs of premises which appear eligible for application of this derogation either indicated an inability to organise the delivery of livestock to permit MHS to consider deploying some of the OV’s time at another premises, or expressed a preference, for business reasons, not to do so. In such cases the FBO may restrict MHS’s ability to make most efficient use of OV time.

<p><b>Examples</b></p> <ul style="list-style-type: none"> <li>• Multi-species slaughterhouse with large proportion of contract kill – most procured via auction markets. FBO currently has very little control over time of arrival of animals and little confidence in ability to change customers’ habits.</li> <li>• Large cattle slaughterhouse with limited lairage capacity – frequent delivery of animals throughout the day. FBO is content with full time presence of OV and does not wish to change</li> <li>• Large cattle and sheep slaughterhouse. FBO could schedule delivery of animals to enable OV not to be present at all times but wishes to have flexibility afforded by full time OV presence.</li> </ul>
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**13.** Where operational considerations do not permit the deployment of the OV at another premises, or where the FBO elects to have full time OV presence,

the possibility to increase the tasks performed by the OV in the premises in post-mortem inspection and off-line tasks should be considered. In some cases this may permit a reduction in the number of MHIs required at the premises.

**Example**  
Multi-species slaughterhouse currently staffed by 1 OV and 2 MHIs – option proposed to reduce to 1 OV and 1 MHI with FBO arranging stock delivery to enable OV to undertake some p-m inspection tasks

Recommendation 4 Consider greater involvement by OV in p-m inspection and off-line tasks	MHS
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Ante-mortem inspection arrangements and procedures

**14.** Arrangements for a-m inspection of livestock were considered at many slaughterhouses to make inefficient use of OV time. Slaughterhouses with low capacity lairages relative to throughput and/or large numbers of small consignments of animals present particular difficulties.

**Example**

- Cattle and sheep slaughterhouse with small lairage relative to daily kill – frequently receiving large number of small batches of animals. OV required in lairage nearly full time for a-m inspection tasks, leaving little time available for other tasks. The OT considered that a recent incident may have been indicative of the OV’s lack of time for effective management of official controls, and recommended an increase in the OV resource at the slaughterhouse.
- Large pig slaughterhouse with small lairage relative to daily kill and poor conditions for a-m inspection (steam, mist) – OV reported that effective a-m inspection was only possible during unloading of pigs.

**15.** Some OVs routinely observe all animals at unloading – for reasons of professional preference or lairage layout or operation. This requires the OV to spend considerable time in the lairage at the expense of other tasks and results in the OV being frequently called away from other tasks to the lairage. Consideration should be given to implementing procedures that permit the OV to carry out a-m inspection without the need to observe unloading of all animals.

**16.** The EU Hygiene Regulations place specific responsibilities on the FBO for the acceptance of animals, and require the OV to be informed of animals that do not comply with specified criteria. We believe that there are opportunities to change procedures and arrangements for a-m inspection to make better use of OV time by having an agreed schedule for a-m inspection.

Recommendation 5 Assess a-m inspection procedures and arrangements at slaughterhouses and investigate opportunities for more efficient use of OV time	MHS FBOs
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**17.** At slaughterhouses that procure animals from markets for immediate slaughter, erratic delivery times were identified as causing inefficient use of OV time. We noted that several slaughterhouses in an area received animals from common market sources. There may be an opportunity for all slaughter animals at a market to be subject to a-m inspection at the market before despatch to individual slaughterhouses and thus to make better use of veterinary resources. If such an arrangement is deemed feasible, implementation will require a national measure or changes to the legislation.

<p><b>Recommendation 6</b> Investigate the feasibility and benefits of carrying out a-m inspection of animals at livestock markets.</p>	<p>FBOs Industry FSA</p>
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Ante-mortem – legislative requirements

**18.** Ante-mortem inspection of prime animals procured directly from farm from known sources was noted to result in the identification of few issues of public health or animal health or welfare concern at a some premises.

<p><b>Example</b> Cattle slaughterhouse killing only prime animals – all cattle consigned directly from farm from producers who are members of company’s producer group. Low incidence of a-m findings with public health or animal health and welfare significance.</p>
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**19.** The OT believes that the risk basis and the benefits of the current arrangements for a-m inspection of livestock should be challenged in the case of prime animals consigned directly from known farm sources and for which FCI has been provided and analysed. We consider that there may be the possibility to apply the option, permitted by the EU Regulations, to allow MHIs to assist the OV in an initial check of animals at a-m inspection. We propose that FSA analyse available data on a-m inspection results and, in collaboration with MHS and Industry, develop an action plan to move towards the application of risk based procedures for a-m inspection.

<p><b>Recommendation 7</b> Develop action plan to apply risk based procedures to a-m inspection</p>	<p>FSA</p>
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**On-line Inspection Tasks**

**20.** Total MHI hours charged to FBOs by MHS are a function of the number of MHIs at the premises and the number of hours charged per MHI; the OT has considered factors affecting both. MHI tasks comprise both on-line p-m inspection and off-line tasks.

**21.** Optimal use of MHS resources on-line requires MHIs to be fully utilised at all times when working on-line – to tailor the configuration and speed of the line such that a whole number of inspectors are required at all times. Issues arise when the number of inspectors required falls between whole numbers or when incidents occur that disrupt the normal operation of the line.

MHS Resource Allocation

**22.** The OT identified a number of premises where it considered that MHS has not been sufficiently robust in challenging current working practices for p-m inspection by MHS staff. In these instances we believe that action by MHS alone could improve efficiency through a reduction in the number of on-line inspection positions.

**Examples**

- Premises slaughtering prime cattle at a moderate speed – head and green offal inspection could be combined with red offal inspection.
- Multi-species premises slaughtering mainly prime animals – inspection position for rectification and re-inspection considered unnecessary
- Multi-species slaughterhouse operating under little time pressure – 2 MHIs considered excessive
- Slaughterhouse with TB reactors included in its kill – full time additional inspectors for collection and recording of samples considered unnecessary
- Sheep slaughterhouse – inspection of red offal after removal from carcass (rather than when attached to carcass) would enable red and green offal inspection positions to be combined
- Meat technician deployed to apply Young Lamb stamp considered unnecessary
- At 3 cattle slaughterhouses – deployment of 2 MHS staff (one checking dentition and reading ear tags, one recording the results) to carry out cattle ID checks considered excessive

**23.** We acknowledge the work done by a previous MHS project, the Staff Verification Team (SVT) Project. The SVT project made detailed recommendations about staffing levels at premises where it considered these to be above what they deemed necessary. At many of the premises included in the Optimisation Project, the SVT recommendations for staff reductions had been agreed and implemented.

**24.** We believe that there are opportunities for MHS management to make more efficient use of its resources by challenging the efficiency of its working methods at every premises.

<p>Recommendation 8 Challenge the efficiency of current MHS working methods at every premises, including the possibility of amalgamating on-line inspection positions.</p>	<p>MHS</p>
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**25.** The elaboration of, and discussion about, the Business Agreement at each premises will present an opportunity for implementation of this recommendation.

We are able to record that we identified instances where such action was already being taken at premises by the Business Managers and Lead Veterinarians who have been in place since April 2008.

Assessment of on-line inspection staff requirements

- Slaughter line layout

**27.** Many slaughter lines appear to have been designed with little consideration of the efficiency of p-m inspection. Instances were observed where the layout of the line restricted the number of inspection tasks an individual MHI was able to perform, resulting in under utilisation of MHI time.

<p>Examples The following were identified at more than one slaughterhouse:</p> <ul style="list-style-type: none"> <li>• Cattle head inspection carried out early on-line at position distant from red and green offal removal – conveying heads to offal inspection position would enable inspection positions to be combined</li> <li>• Green offal chutes for cattle directed away from line on opposite side to red offal inspection position, often in inaccessible position preventing combination of green offal inspection with another position</li> <li>• Cattle carcass inspection carried out by one MHI at floor level and one on a fixed platform – installation of a rise and fall platform would enable one MHI to perform all carcass inspection</li> </ul>
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<p>Recommendation 9 Assess, and discuss with MHS, the possibility of modifying slaughter line layout or equipment to permit more efficient use of MHI resources.</p>	<p>FBOs MHS</p>
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<p>Recommendation 10 Discuss inspection positions with MHS when designing new lines or modifying existing lines.</p>	<p>FBOs FSA</p>
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- Multi-species slaughterhouses

**28.** Slaughterhouses that slaughter different species at different times may require different numbers of inspection positions for each species. The OT identified opportunities for FBOs to adapt their operation (e.g. change line speeds) or make physical modifications to the line so that the same number of MHIs are required for inspection of each species.

MHS staff requirements for animal identification checks and TSE and SRM controls vary between cattle and sheep, and there are none for pigs.

<p>Examples</p> <ul style="list-style-type: none"> <li>• Install rise and fall platform to reduce number of inspection positions for cattle to the same as that for sheep and pigs</li> <li>• Extend length of cattle green offal chute to combine fore carcass and green offal inspection positions to achieve same number of inspection positions for all species</li> <li>• Adjust line speed to enable one inspector, with assistance of OV when available, to carry out all inspection tasks for cattle, sheep and pigs</li> <li>• 3-species slaughterhouse – MT carries out cattle passport, ID and dentition checks, but has no direct role during slaughter of pigs.</li> </ul>
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<p>Recommendation 11</p> <p>Assess opportunities to modify operation of multi-species abattoirs such that demand on resources for p-m inspection and other tasks is similar for each species</p>	<p>FBOs</p>
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**29.** An alternative approach to optimising the use of MHS staff at a local level may be the cooperation between FBOs at two or more premises in close proximity to arrange slaughter schedules such that one member of MHS staff could be ‘shared’ to cover periods of maximum demand at each premises.

<p>Recommendation 12</p> <p>Arrange slaughter schedule to enable MHS to deploy staff to cover periods of maximum demand at more than one premises.</p>	<p>FBOs MHS</p>
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- Class of animals slaughtered

**30.** The amount of pathology present in carcasses and other parts presented for inspection has an impact on the work of MHIs. There will generally be less pathology present in young prime animals than in adults (cows, ewes, sows). The demand for inspection resource is relatively constant at premises where only one class of animals is slaughtered. Where different classes of animal are slaughtered there may be considerable variation in the demand for inspection resource during any given period. MHS generally provides a complement of staff to cater for maximum demand, and thus may have excess staff during periods when prime animals are slaughtered.

<p>Example</p> <ul style="list-style-type: none"> <li>• Sheep slaughterhouse killing both lambs and ewes – MHS resources premises for ‘worst case’, slaughter of poor quality ewes with high levels of pathology. MHI resource not fully utilised when prime lambs slaughtered.</li> <li>• Cattle and sheep slaughterhouse slaughtering prime UTM, clean OTM cattle and cows. Inspection resource may not be fully utilised when UTM cattle slaughtered.</li> </ul>
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**31.** The OT identified opportunities for FBOs to tailor the speed of operation to the inspection demand for each class of animals to enable MHS to deploy its staff in an optimal manner.

Recommendation 13 Adjust speed of operation to enable MHS to make efficient use of inspection resource for all classes of animals slaughtered.	FBOs
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**32.** We have concerns about the pressures that may be applied to MHS staff when slower line speeds are deemed necessary, particularly at slaughterhouses where the FBO employs staff on a piece rate basis. It is important that FBOs recognise that reducing line speed on occasions may be a consequence of optimising use of MHS resources.

- Detention/rectification arrangements

**33.** Procedures for dealing with carcasses or other parts in which contamination or pathology is detected at p-m inspection have an important bearing on efficient use of inspection resource. Common procedures are to rectify minor issues on-line, to divert to a detention-line in the slaughterhall or to move to a specific detained room off the main line. For production reasons, many FBOs prefer rectification to be carried out on detained lines. The OT observed instances where it considered detained lines to have inadequate capacity for rectification and inspection at the normal line speed, resulting in MHIs having to work under undue pressure to the possible detriment of inspection standards. In addition, there is the possibility of MHIs coming into conflict with FBOs when they stop the line to enable rectification of detained carcasses. There are opportunities for FBOs to improve detention/rectification arrangements to enable MHIs to work more efficiently.

Examples <ul style="list-style-type: none"> <li>• Large pig slaughterhouse with mechanised rectification loop and small capacity off-line detained rail. System observed to work well under normal circumstances but not when batch of pigs with high level of pathology slaughtered – configuration of mechanised rectification loop does not permit carcasses to be re-circulated, and detained rail becomes full. MHIs obliged to stop line to catch up.</li> <li>• The FBO of a high speed sheep line had recently modified the end of the line to provide more space for inspection and a rectification rail loop (un-mechanised) to enable rectification and re-inspection to be carried out at normal line speed under most circumstances</li> </ul>
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Recommendation 14 Assess options for changing detained/rectification facilities and procedures to permit more efficient use of MHIs and better operation of the slaughter line.	FBO
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- Speed of line

**34.** The OT based its opinions on resource requirements on empirical evidence. Detailed assessment of the number of inspections that an MHI can perform effectively in a given time was not within the scope of the project. Our view is that such assessments should be made on the basis of the

desired outcome of inspection procedures, and not simply on measured inputs. This issue is addressed later in the Report.

- Physical working conditions

At some premises the physical working conditions for MHIs – particularly congestion on small platforms – did not appear to us to be conducive to effective inspection.

- Effectiveness of FBO Food Safety Management systems

**35.** FBOs are required to present for inspection carcasses with no visible contamination and should achieve this by the effective implementation of food safety management systems. We have observed differences between premises in the diligence of FBOs to ensure that clean carcasses are presented for inspection

<p>Example</p> <ul style="list-style-type: none"> <li>• High speed sheep line – 2 plant staff on-line immediately before carcass inspection position to check for and trim minor contamination, and to ensure that clean, correctly dressed carcasses are presented for inspection</li> <li>• Use of steam vacuum equipment to remove minor wool contamination from sheep carcasses</li> </ul>
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FBOs who apply ‘best practice’ in their food safety management systems will reduce the burden on MHIs and the need for rectification, and enable MHS staff to work more efficiently.

<p>Recommendation 15 Seek to achieve ‘best practice’ in food safety management systems to minimise necessity for intervention by MHS staff at p-m inspection.</p>	<p>FBO MHS</p>
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Inspection procedures

- Statutory requirements – simplified inspection

**36.** The EU Hygiene Regulations lay down detailed rules for inspection of each species. Under specified conditions, ‘risk based meat inspection without incisions’ (usually described as ‘visual only inspection’, VOI) may be applied to fattening pigs and young bovine, ovine and caprine animals. We are aware that FSA, MHS and industry are conducting a pilot project on pigs, and have observed a premises which we believe may be suitable for implementation of VOI of lambs.

<p>Example Large sheep slaughterhouse sourcing majority of lambs directly from farms, good IT traceability system</p>
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Recommendation 16 Consider trialling simplified inspection systems for lambs	FSA
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- Statutory requirements - green offal inspection

**37.** The EU Hygiene Regulations require either visual inspection of the gastro-intestinal tract (sheep) or visual inspection of the gastro-intestinal tract and palpation of the gastric and mesenteric lymph nodes (cattle and pigs). The OT has observed inspection of green offal carried out to varied standards. We recognise that there is a general scepticism about the value of green offal inspection, and recommend that the outcomes of green offal inspection in all species be analysed. Depending on the results of an analysis, there may be an opportunity for a pilot project on revised inspection procedures.

Recommendation 17 Analyse the results of green offal inspection and consider implementing a pilot project on revised inspection procedures.	FSA
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#### Assessment of inspection outcomes

**38.** We note that MHS currently has no standard systems in place to assess the outcome of inspection procedures. Instructions to OVs in the MOC about assessing MHI performance are very general and leave the OV to implement his/her own methods. We believe that there is an important need for a detailed system of assessment, based on statistical principles. Such a system would have benefits in the context of optimisation of use of MHS resources by contributing to the assessment of staffing levels and by identifying factors influencing inspection performance. It would also provide a robust method to assess the performance of inspection at abattoirs where the OV is not present at all times during p-m inspection.

Recommendation 18 Develop and implement a formal, standard system to assess inspection performance	MHS FSA
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### **Off-line tasks**

**39.** MHIs carry out a number of off-line tasks associated with official controls. The burden of these tasks is variable, depending on factors such as the species and class of animals slaughtered. Other off-line tasks concern MHS operational procedures including the collection and input of operational information.

Assessing the amount of MHS resource required for these tasks was difficult for the OT during its short visits to premises. However, we identified that MHS staff spend a considerable amount of time on data input, and consider that there are possibilities for more efficient use of MHS resources in this area. This specific issue is addressed elsewhere in the report.

## Animal Identification, TSE and SRM controls

**40.** MHS carries out a number of tasks in slaughterhouses for FSA and Rural Affairs Departments under Service Level Agreements (SLAs) as part of the UK controls on TSEs and SRM.

### Cattle passport, identification and dentition checks

**41.** FBOs are required to check the eligibility of cattle for slaughter by checking passports and confirming individual animal identification. Following slaughter, MHS staff check passports, identification and dentition; these checks are usually performed on the bleed line. MHS checks are subsequently subject to further levels of documentary checks. Almost all of the slaughterhouses killing cattle that the OT visited use IT systems for traceability - passport information is captured by bar code scanners. All FBOs had procedures in place to physically check cattle ear tags before slaughter – often on more than one occasion. Most systems had been in use for some time and appeared to us during our short scrutiny to be robust, any initial problems having been corrected.

#### Examples

At most premises the system for recording and checking cattle identification information was demonstrated to the OT, including the response to attempts to enter animals into the wrong category.

We were particularly impressed by an FBO system that involved a member of the FBO's staff entering a number of digits from the ear tag into an on-line terminal following the slaughter of each animal. If these digits do not match the information previously entered during checks before slaughter, the line is automatically stopped. (A similar system was observed in a slaughterhouse in Northern Ireland).

**42.** We believe that the proportionality and benefit of MHS carrying out checks which duplicate FBO checks on all cattle slaughtered should be challenged. Duplication of checks may introduce a lack of clarity that responsibility for verifying eligibility lies with the FBO. We propose that MHS SLA partners consider replacing the current 100% checks with a system of audit of FBO controls.

#### Recommendation 19

Assess the proportionality of 100% checks by MHS on FBO checks on cattle passports and identification and consider replacing with audit of FBO systems.

FSA  
R A  
Depts

**43.** If 100% passport and ID checks were to be discontinued, we consider that dentition checks could be carried out at head inspection and results recorded on an exception basis. We note that any future increase in the age threshold for TSE testing may render dentition checks unnecessary.

Recommendation 20 Consider performing cattle dentition checks at the head inspection position	MHS
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**44.** The weak point in any system for checking the identity of cattle is the reading and recording of ear tags. The OT’s suggestion that an electronic form of cattle ID would deliver a more reliable and economical system was agreed by most FBOs, who cited competition for livestock as the reason for not instituting such a requirement for the cattle they procured. We understand that there is a commercial plan in NI to introduce electronic ID of cattle.

Recommendation 21 Consider implementing a requirement for all cattle consigned for slaughter to be electronically identified.	Industry FBOs
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OTM cattle identification checks

**45.** During visits early in the project, the OT questioned the necessity for a member of MHS staff to carry out parallel checks to the FBO on OTM cattle identification in the lairage. We understand that our proposal that such checks be discontinued has been implemented.

Cattle vertebral column controls

**46.** The health mark is not applied to OTM cattle carcasses until a negative brain stem test result has been received. The OT believes that application of the health mark to carcasses is inefficient use of MHI time – especially in premises with sophisticated traceability systems.

**47.** We understand that MHS working instructions permit health marking of OTM carcasses to be delegated to FBOs’ staff, under appropriate MHS supervision. In premises where all carcasses are conveyed to on-site boning rooms, we question the value of applying the health mark to these carcasses.

Recommendation 22 Consider delegating physical task of applying health marks to OTM carcasses to FBOs. Review current policy on procedures for applying health marks to OTM carcasses.	MHS FSA R A Depts.
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The OT considers the controls MHS is required to apply to OTM carcasses containing spinal column to be disproportionate.

<p>Example</p> <ul style="list-style-type: none"> <li>• 2 MTs deployed to provide 100% supervision of 2 shift operation of a boning room of a large cattle slaughterhouse. All carcasses processed in the boning room are delivered directly from the chills of the co-</li> </ul>
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<p>located slaughterhouse. FBO has electronic traceability system from live animal delivery to meat despatch.</p> <ul style="list-style-type: none"> <li>• Loading of OTM carcasses (following receipt of negative brain stem test results) supervised by MHI at 0500 most days including Saturday and Sunday</li> </ul>
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<p>Recommendation 23 Assess the proportionality of OTM cattle vertebral column controls</p>	<p>FSA R A Depts</p>
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Sheep dentition checks

**48.** MHS is required to carry out dentition checks on all young lambs – in many cases this involves the deployment by MHS of one person specifically for this task. We question the necessity for such a level of checks by MHS and propose that consideration be given to making this a responsibility of the FBO, subject to MHS audit.

<p>Recommendation 24 Consider replacing 100% checks on FBOs’ checks of young lamb dentition with a system of audit of FBOs’ checks.</p>	<p>FSA R A Depts</p>
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**49.** In the short term, the OT has observed an operation that enabled dentition checks to be carried at by a MHI at the regular offal inspection position.

<p>Example FBO’s staff remove sheep heads, place in plastic bag and attach to mechanised line adjacent to each carcass. MHI performs dentition check at offal inspection position. This removes the need for a MT on-line specifically to carry out dentition checks.</p>
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<p>Recommendation 25 Investigate possibilities to present sheep heads for dentition checks by a MHI at a regular p-m inspection position.</p>	<p>FBO</p>
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Sheep spinal cord checks

**50.** The OT considers that the proportionality of MHS checks on spinal cord removal for all older sheep should be challenged, and suggests that audit of FBO systems by means of sample checks of carcasses in chillers may be an appropriate control.

<p>Recommendation 26 Consider replacing 100% MHS checks older sheep spinal cord removal with a system of audit of FBOs’ systems.</p>	<p>FSA R A Depts</p>
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## Premises operating hours

**51.** The OT recorded marked differences in the both the length of working days at slaughterhouses and the consistency of working day length throughout the week.

**52.** Slaughterhouses procuring livestock from markets for slaughter the same day have particular issues because of the unpredictability of the arrival of animals at the slaughterhouse. Instances were reported where both FBO and MHS staff were inactive for periods while awaiting delivery of animals. We consider that there may be opportunities for timing of sales of slaughter animals to be arranged to promote more consistency in livestock delivery times and more efficient working by FBOs and MHS.

<p>Recommendation 27 Investigate with livestock market operators the possibility of arranging sales of slaughter animals to better suit slaughterhouse operations.</p>	<p>FBOs</p>
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**53.** Optimal use of MHS resources requires all staff to be fully employed for all the hours for which they are paid. MHS ability to plan effective staff deployment is dependent on the time pattern of operation of each premises. Slaughterhouses that work short days or have an erratic working pattern present particular difficulties for MHS to provide official controls efficiently. The OT considers this an area where there are considerable opportunities for FBOs to plan their operations to enable MHS to provide official controls in a more efficient manner.

<p>Example</p> <ul style="list-style-type: none"> <li>• Multi-species slaughterhouse operating 29 hours per week over 5 days of varied duration (finishing at 1230 one day) – consider slaughtering on 4 longer working days</li> <li>• Slaughterhouse operating 3 days per week – consider changing working to days to enable MHS to make more efficient use of staff in area</li> </ul>
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<p>Recommendation 28 Investigate changes to working patterns that would enable MHS to deliver official controls more efficiently</p>	<p>FBO</p>
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## Information recording and IT systems

### MHS systems

**54.** Criticism by MHS staff of the speed of connection to the MHS server was a consistent finding, and connection failure of several days' duration was reported at 2 premises. In addition, data entry tasks were reported to be time consuming for MHS staff because of the need to move between entry

screens. We believe there are opportunities to make more efficient use of MHS staff time in premises by reducing the amount of time spent on data entry.

We understand that MHS has a programme in place to improve IT connection speeds to its staff in premises and to improve data entry systems.

<p>Recommendation 29 Implement programme to improve speed and reliability of IT connections to MHS staff in premises and to improve data entry systems</p>	<p>MHS</p>
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**55.** The data entry requirements for Food Chain Information (FCI) and inspection results for pigs were identified as a particular issue at premises where the majority of FCI was received in paper form.

<p>Example Multi-species slaughterhouse slaughtering fattening pigs and sows. Less than 10% of FCI received by the electronic route. Data entry for FCI and inspection results estimated to consume at least 50% of the time of a MHI.</p>
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**56.** The data input burden on MHS staff is reduced at slaughterhouses which receive a large proportion of FCI by the electronic route. FBOs can contribute to more efficient use of MHS staff time by encouraging pig suppliers to provide FCI electronically.

<p>Recommendation 30 Encourage pig suppliers to provide FCI by electronic routes</p>	<p>FBOs</p>
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**57.** The OT recognises the potential value of FCI as part of the farm to fork approach to food safety and for implementation of simplified inspection systems.. However, in addition to concerns about the administrative burden relating to receiving and recording of FCI for pigs by FBOs and MHS, we have reservations about the use to which FCI is put at many plants, and consequently about the public health benefits accrued. We believe that there is a need to review all aspects of FCI for pigs and how the information is used in FBOs' food safety management systems. This should be done before FCI is implemented more widely so that the experience gained from pigs can be applied to other species.

<p>Recommendation 31 Review the implementation of FCI for pigs in terms of food safety benefits and administrative burden, and apply the findings to the introduction of FCI for other species.</p>	<p>FSA</p>
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**58.** We identified a considerable administrative burden on both FBOs and MHS at slaughterhouses receiving large numbers of small consignments of pigs - each consignment, irrespective of size, requires similar actions. We believe that consideration should be given to changing the current arrangements for provision and receipt of FCI for this type of slaughtering operation to reduce administrative burden while retaining the public health benefits.

The OT commends the proposal to amalgamate FCI and pig movement information for animal health purposes (AML2) that is currently under discussion.

**Example**  
 Multi-species slaughterhouse providing slaughtering facilities for mainly local small producers receives many small consignments of pigs (e.g. 140 pigs in 50 separate consignments). FCI and movement document required for each consignment.

<b>Recommendation 32</b> Consider changes to requirements for provision of FCI for slaughterhouses receiving small consignments of pigs	<b>FSA</b>
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**Exchange of information between MHS and FBO IT systems**

**59.** 17 of the 19 slaughterhouses visited have IT systems in place for traceability and other commercial purposes.  
 All large cattle slaughterhouses have a computer terminal in the lairage for the recording of cattle identification information. A further terminal is situated at the end of the slaughter line to capture carcass weights and grading information.  
 Large pig and sheep slaughterhouses have similar systems which generally operate on a batch basis.

**60.** In addition to cattle eligibility checks (discussed above), we believe that there are opportunities for MHS to make use of relevant information on FBO IT systems.

**Example**  
 Information for TB reactor forms could be generated from the FBO IT system to reduce burden of written forms.

**61.** We have observed slaughterhouses where the FBO has installed additional terminals on the slaughter line before the weigh scale to check cattle identification or to enable MHIs to capture p-m inspection results on-line.

- Examples**
- Cattle slaughterhouse using on-line terminal to verify cattle identification information.
  - 2 cattle slaughterhouses have installed an on-line touch screen terminal which is used by MHIs to record p-m findings. No direct link between FBO system and MHS IT system.
  - Large sheep slaughterhouse had recently installed an on-line touch screen terminal – trials due to begin
  - On-line touch screens for capture of p-m inspection data were observed at the visits to premises in NI. We were informed that p-m data is gathered in this fashion at all slaughterhouses in NI.

**62.** Several FBOs indicated a willingness to install a terminal or terminals for the capture of p-m inspection results.

We believe that on-line recording of p-m inspection results has the potential for more efficient use of MHI time, by removing the necessity for transcription of results to the MHS IT system.

**63.** We identified a wish amongst FBOs to cooperate with MHS about hardware and the development of systems for information exchange for the mutual benefit of both parties. We believe that there are opportunities for FBOs and MHS to collaborate to achieve more efficient use of MHS resources – either at an individual premises level or on a wider industry basis.

Recommendation 33 Investigate opportunities for exchange of information between FBO and MHS IT systems	MHS FBOs
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## Northern Ireland

**64.** The timing of the OT's visit to Northern Ireland coincided with the transition period for the removal of DARD personnel from slaughterhouse lairages. Previously all issues concerning acceptance of animals for slaughter were handled by DARD staff who had full access to the DARD IT system.

**65.** We gained the view that FBOs were generally content with this transfer of responsibility, but both they and OVs expressed concerns about the mechanisms for resolving any animal ID or disease history issues that might arise.

**66.** Many official checks on TSE and SRM control measures have been discontinued and replaced by sample checks or audit of FBO systems. At the cattle slaughterhouse visited, all ID checks for UTM cattle are carried out by the FBO. For OTM cattle, DARD carries out 10% checks. The FBO reported his satisfaction with a system where he has complete responsibility for control. The FBO is responsible for verifying that all young lambs are eligible for slaughter as such; DARD carries out a 10% check on dentition.

**67.** Inspection of cattle and pigs was observed at the premises visited. The on-line inspection resources employed were comparable with those in similar slaughterhouse in GB.

**68.** P-m inspection results for cattle and pigs were captured by DARD inspectors using on-line terminals at the inspection positions. It was reported that a similar method is not used for sheep because of delays in entering batches of sheep onto the APHIS system when they are received.

**69.** We identified similar issues concerning use of OV time as in GB. The prevalence of small farm units and part-time farmers in NI results in the delivery to abattoirs of large numbers of small consignments of cattle and sheep, with the consequence of a large proportion of OV time being spent in the lairage on a-m inspection tasks. At one premises we considered the amount of time the OV had to carry out duties in the slaughterhouse to be barely sufficient.

<p>Recommendation 34          Take account of policy and systems implemented in NI for official controls on animal identification, TSE and SRM when considering controls in GB.</p>	<p>FSA          R A          Depts          MHS</p>
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## **Conclusions**

**70.** The OT identified opportunities for more efficient use of MHS resources and reductions in the hours worked by MHS staff at all the slaughterhouses it visited. Better use of MHS resources could arise from MHS actions alone, FBO actions alone, MHS and FBOs working together, changes to MHS instructions through policy changes by FSA and other government departments, and changes to EU legislation.

**71.** The OT has not quantified the potential savings in each category because it does not consider it meaningful, since the sample of premises visited was not random and had a degree of bias, and each visit enabled us to gain only a short, 'snap shot' view of MHS's activities at the premises.

### **TSE and SRM controls**

**72.** We consider that the area for greatest potential efficiency savings is the performance of checks by MHS to verify that FBOs have fulfilled their legal requirements relating to animal identification, TSE and SRM legislation. This level of checking, which in most cases is duplication of checks carried out by FBOs, is dictated by FSA and Rural Affairs Departments. We were struck by the different approach to controls between GB and NI – some of the official controls we observed in NI were similar to the recommendations we had independently formulated before our visit to NI. The OT acknowledges that the control regime for TSE and SRM in slaughterhouses is under consideration, and recommends that this is given priority.

**73.** The OT obtained a favourable view of the systems that most FBOs have in place for checking the identification and eligibility for slaughter of cattle. We believe that the duplication of these checks by MHS may have the affect of confusing lines of responsibility, and that their proportionality to the public health risks should be subject to challenge.

**74.** Changes to the policy on TSE controls are a matter for FSA and Rural Affairs Departments, but instances were identified where FBOs and MHS can work together to enable the current controls to be implemented with fewer MHS staff.

### **MHS resource allocation**

**75.** At a number of premises our assessment of the number of MHS staff necessary to carry out official duties and associated MHS operational tasks was less than that of MHS. We acknowledge that we were only able to gain a 'snap shot' of the premises and MHS's activities during our visits, but believe that there are opportunities for optimising use of MHS resources through a rigorous challenge to the current working practices.

**76.** The process of formulating Business Agreements will be an ideal opportunity for MHS management to assess staff requirements.

**77.** It is important to record that we identified instances where the newly-appointed MHS Business Managers and Lead Veterinarians have been active in challenging efficiency of MHS operations at individual premises. Some of the opportunities for optimising use of resources that we identified had been previously recognised by BMs and LVs.

**78.** There is an inherent difficulty in any analysis of resource requirements in that only whole numbers of MHS staff can be deployed at a premises at a given time. Any changes to the way tasks are performed may result in more efficient working but may not be sufficient to permit a reduction of a whole position. Aggregation of small efficiency gains may lead to the possibility of tangible efficiency savings by the reduction of a whole position. We have made recommendations throughout the report where we have identified opportunities for more efficient working - many of these involve cooperation between FBOs and MHS. This is a major conclusion of our work – optimal use of MHS resources requires FBOs and MHS to work together and to identify and implement actions which will enable MHS staff to work in a more efficient manner.

#### FBO operations

**79.** Optimal use of MHS resources requires the time of all staff to be fully utilised for all the hours they are employed.

**80.** Disagreement and dispute about the number of MHIs required at a slaughterhouse appear most frequent at premises with inconsistent demand for inspection resource - slaughtering different species consecutively, or slaughtering different classes of animals. MHS is expected to provide a complement of inspection staff to cope with maximum demand i.e. the species with the greatest number of on-line inspection positions or animals with the greatest likelihood of having pathology requiring action by MHIs. The OT considers that optimising the use of MHS resources requires the FBO, in cooperation with MHS, to consider how the operation of the slaughterhouse can be modified to promote a constant demand for inspection resource. Such modifications may include: scheduling of slaughter animals, rate of operation, detention and rectification arrangements (available capacity and space, provision of FBOs' staff for rectification).

**81.** MHS ability to plan effective staff deployment is dependent on the time pattern of operation of each premises. Slaughterhouses that work short days or have an erratic working pattern present particular difficulties for MHS to provide official controls efficiently. The OT visited several slaughterhouses, part or all of whose business is contract slaughter, whose operators have limited control over daily slaughter numbers, which can be influenced by short term fluctuations in markets for livestock or meat. We consider that the operation of premises with daily variations in kill numbers, and hence variable demand for inspection resources, is not compatible with efficient use of MHS resources.

**82.** The conclusion of the OT is that FBOs have a commercial decision about how they operate their premises – either to achieve a relatively constant demand for inspection resources, both in terms of numbers of MHIs and hours of operation, through collaboration with their customers and MHS, or to operate in a more flexible manner and to accept the additional costs arising from MHS being prevented from making optimal use of its staff.

**83.** Under-utilisation of MHI time as a consequence of slaughterline layout and equipment was observed at many premises. There is currently little incentive for FBOs to make capital investment by changing the physical layout of their slaughter line, but the OT frequently identified opportunities for future efficiency savings by combining inspection positions through such changes.

### IT issues

**84.** We believe that collaboration between MHS and FBOs, at both industry and individual premises level, on information capture and recording presents opportunities for more efficient and effective working by MHS staff.

Most slaughterhouse FBOs have IT systems to support their businesses. There are overlaps between the information recorded on these systems and that required by MHS, and there may be possibilities for MHS to make use of relevant information on FBO systems.

MHS has implemented a process for recording p-m inspection findings for pigs on a batch basis, currently using manual systems for recording information on-line for subsequent entry onto the MHS IT system. Similar systems for recording p-m inspection findings for individual cattle and batches of sheep are planned. We believe that accurate and efficient capture of inspection findings, certainly in large slaughterhouses with fast lines, will be facilitated by the use of on-line electronic methods. There is potential for more efficient use of MHS resources through reducing time spent in data entry. We gained a very favourable impression of the system employed at slaughterhouses in NI for on-line data capture.

FBOs of several premises visited expressed a desire to provide better feedback of inspection results to their suppliers and were willing to install terminals in their slaughterhouses for the use of MHIs to record inspection information. While recognising that there will be financial and possibly legal issues, we have made a number of recommendations for collaboration in this area. In addition to our recommendations about MHS and FBO investigating opportunities for exchange of information between FBO and MHS IT systems, the industry representative on the OT has already held meetings with MHS, industry and IT system providers and intends to produce a report on this subject.

### OV resources

**85.** We have identified opportunities to optimise use of OV resources – by applying the derogation which allows the requirement for the OV to be present during p-m inspection to be relaxed, and by more efficient local arrangements for a-m inspection. In some instances the former is dependent on how

'discontinuous slaughter' is interpreted; our view is that, in the interests of a truly risk based approach to official controls, MHS should apply a pragmatic interpretation.

**86.** We believe that there are actions that can be taken by both individual OVs and FBOs to make a-m inspection more efficient. We were concerned to see situations where the OV appeared to be at the 'beck and call' of the FBO – we do not consider that this enables the OV to carry out other tasks effectively. At one slaughterhouse we were of the view that, because the a-m inspection arrangements consumed virtually all the OV's time and gave him no time to carry out any other tasks in the slaughterhouse effectively, there was a need for additional OV resources, at least for part of the working day. If actions to 'release' OV time are successful, there will be a need for MHS to decide how to make most effective use of this time – between deploying OVs to specific OV tasks at more than one premises, and using OVs as additional resource for p-m inspection, other tasks not routinely undertaken by OVs, and management of the MHS team at the premises. Decisions on OV deployment will require MHS to balance different strategic needs and to take account of local operational considerations.

**87.** We are conscious of the apparent contradiction between our suggestions for reducing OV presence at some premises and the MHS's proposals for the OV to take a more prominent role as leader of the MHS team in premises. However, we consider that application of all or some of the actions relating to OV presence will have the benefit of generating time for the OV to carry out the duties of team leader.

### Business risk

**88.** A logical consequence of the optimisation of MHS resources in premises is that MHS is likely to operate with less reserve – there will be less 'slack' in the system. This will have an impact on MHS's ability to react to changed circumstances or unexpected occurrences, and thus on FBOs' operations. OT considers that, in effect, this represents a transfer of some business risk from MHS to FBOs as the *quid pro quo* for potentially reduced costs.

**89.** FBOs should recognise that collaboration with MHS is necessary to enable it to work more efficiently, and that this will involve a degree of risk to their business operation. Examples of business risks are:

- FBO may not be able to slaughter animals when desired because the OV is not present to carry out a-m inspection
- FBO may need to operate at a slower rate if a batch of animals with a high level of pathology is slaughtered
- FBO may be unable to increase speed of operation if MHS staff complement is tailored to typical rate.

Proposed topics for pilots, national measures or legislative change

**90.** The OT was asked to identify areas where it considered that FSA should apply the possibility of adapting certain requirements of the EU Hygiene Regulations by the adoption of national measures or pilot projects, or seek to change EU legislation in the longer term.

**91.** We are aware that FSA has a major project to consider future meat hygiene controls. We have therefore restricted our comments in this area to practical issues which might benefit from action in the short term. The Hygiene Regulations state that the nature and intensity of official controls should be based on an assessment of public health risks, but lay down prescriptive requirements for a-m and p-m inspection.

We consider that FSA should analyse the results of a-m inspection and their significance, and consider options for a more risk based approach.

The regulations permit the application of risk based meat inspection without incisions in fattening pigs, calves and lambs. A project about implementation of simplified inspection in pigs is underway. We believe that a similar project for lambs should be considered.

The public health value of green offal inspection is frequently questioned, and we observed very varied standards of inspection. We believe that an assessment of the findings of green offal inspection and their relevance to public health should be carried out for each species with a view to conducting a pilot project.

## Recommendations

RECOMMENDATION	ACTION				
	MHS	FBOs	INDUSTRY	FSA	RURAL AFFAIRS DEPTS.
1. For all slaughterhouses, assess eligibility for adaptation of the requirement for the OV to be present at all times during p-m inspection.	<b>X</b>				
2. Develop action plan to amend the prescriptive requirements of EU legislation relating to the presence of the OV at slaughterhouses.			<b>(X)</b>	<b>X</b>	
3. Consider lairage capacity and pattern of livestock arrival to enable MHS to adapt the requirement for the OV to be present at all times during p-m inspection, where risk factors permit.		<b>X</b>			
4. Consider greater involvement by OV in p-m inspection and off-line tasks	<b>X</b>				
5. Assess a-m inspection procedures and arrangements at slaughterhouses and investigate opportunities for more efficient use of OV time	<b>X</b>	<b>(X)</b>			
6. Investigate the feasibility and benefits of carrying out a-m inspection of animals at livestock markets.		<b>X</b>	<b>X</b>	<b>X</b>	
7. Develop action plan to apply risk based procedures to a-m inspection				<b>X</b>	
8. Challenge the efficiency of current MHS working methods at every premises, including the possibility of amalgamating on-line inspection positions.	<b>X</b>				
9. Assess, and discuss with MHS, the possibility of modifying slaughter line layout or equipment to permit more efficient use of MHI resources.	<b>(X)</b>	<b>X</b>			
10. Discuss inspection positions with MHS when designing new lines or modifying existing lines.		<b>X</b>		<b>(X)</b>	

## Recommendations

11. Assess opportunities to modify operation of multi-species abattoirs such that demand on resources for p-m inspection and other tasks is similar for each species		<b>X</b>			
12. Arrange slaughter schedule to enable MHS to deploy staff to cover periods of maximum demand at more than one premises.	<b>(X)</b>	<b>X</b>			
13. Adjust speed of operation to enable MHS to make efficient use of inspection resource for all classes of animals slaughtered.		<b>X</b>			
14. Assess options for changing detained/rectification facilities and procedures to permit more efficient use of MHIs and better operation of the slaughter line.		<b>X</b>			
15. Seek to achieve 'best practice' in food safety management systems to minimise necessity for intervention by MHS staff at p-m inspection	<b>(X)</b>	<b>X</b>			
16. Consider trialling simplified inspection systems for lambs				<b>X</b>	
17. Analyse the results of green offal inspection and consider implementing a pilot project on revised inspection procedures.				<b>X</b>	
18. Develop and implement a formal, standard system to assess inspection performance	<b>X</b>			<b>X</b>	
19. Assess the proportionality of 100% checks by MHS on FBO checks on cattle passports and identification and consider replacing with audit of FBO systems.				<b>X</b>	<b>X</b>
20. Consider performing cattle dentition checks at the head inspection position	<b>X</b>				
21. Consider implementing a requirement for all cattle consigned for slaughter to be electronically identified.		<b>(X)</b>	<b>X</b>		

## Recommendations

22. Consider delegating physical task of applying health marks to OTM carcasses to FBOs. Review current policy on procedures for applying health marks to OTM carcasses.	<b>X</b>			<b>X</b>	<b>X</b>
23. Assess the proportionality of OTM cattle vertebral column controls				<b>X</b>	<b>X</b>
24. Consider replacing 100% checks on FBO's checks of young lamb dentition with a system of audit of FBO's checks.				<b>X</b>	<b>X</b>
25. Investigate possibilities to present sheep heads for dentition checks by a MHI at a regular p-m inspection position.		<b>X</b>			
26. Consider replacing 100% MHS checks older sheep spinal cord removal with a system of audit of FBO's systems.				<b>X</b>	<b>X</b>
27. Investigate with livestock market operators the possibility of arranging sales of slaughter animals to better suit slaughterhouse operations.		<b>X</b>			
28. Investigate changes to working patterns that would enable MHS to deliver official controls more efficiently		<b>X</b>			
29. Implement programme to improve speed and reliability of IT connections to MHS staff in premises and to improve data entry systems	<b>X</b>				
30. Encourage pig suppliers to provide FCI by electronic routes		<b>X</b>	<b>(X)</b>		
31. Review the implementation of FCI for pigs in terms of food safety benefits and administrative burden, and apply the findings to the introduction of FCI for other species.				<b>X</b>	
32. Consider changes to requirements for provision of FCI for slaughterhouses receiving small consignments of pigs				<b>X</b>	
33. Investigate opportunities for exchange of information between FBOs and MHS IT systems	<b>X</b>	<b>X</b>	<b>(X)</b>		
34. Take account of policy and systems implemented in NI for official controls on animal identification, TSE and SRM when considering controls in GB.	<b>(X)</b>			<b>X</b>	<b>X</b>

## Glossary

a-m	Ante-mortem
BMPA	British Meat Processors Association
CA	Competent Authority
	Department of Agriculture and Rural Development
	Northern Ireland
DARD	
FBO	Food Business Operator
FCI	Food Chain Information
FSA	Food Standards Agency
ID	Identification
MHI	Meat Hygiene Inspector
MHS	Meat Hygiene Service
MOC	Manual of Official Controls
MT	Meat Technician
NI	Northern Ireland
OT	Optimisation Team
OTM	Over Thirty Months
OV	Official Veterinarian
p-m	Post-mortem
	Rural Affairs Departments (England, Scotland & Wales)
R A Depts	
SRM	Specified Risk Material
TSE	Transmissible Spongiform Encephalopathy
UTM	Under Thirty Months
VOI	Visual only inspection

## Appendix 1

### **Methods**

Between May and September 2008 the OT visited 19 red meat slaughterhouses in GB subject to delivery of official controls by MHS.

### **Geography**

<b>Location</b>	<b>Premises visited</b>
England	14
Scotland	3
Wales	2

### **Species**

<b>Species slaughtered</b>	<b>Premises visited</b>
Single (or predominantly single) species	10
Multi-species	9

### **Approval status**

<b>Approval</b>	<b>Premises visited</b>
Full approval	14
Conditional approval	2
Yet to receive approval visit	3

### **Charging basis**

<b>Charging basis</b>	<b>Premises visited</b>
Throughput (headage)	17
Time	1
Variable – throughput & time	1

### **Industry body membership**

<b>Organisation</b>	<b>Premises visited</b>
BMPA	8
AIMS	9
SAMW	3

(one FBO a member of BMPA and AIMS)

Premises were selected on the basis of an analysis of MHS time costs or were nominated by industry bodies as premises at which delivery of official controls was considered worthy of scrutiny.

Before each visit the OT was provided with information pack for the premises, comprising: throughput data; SVT report, where available; recent Invoice Backing Schedules; most recent OV audit report.

At each visit the OT:

- verified operational information with the FBO, gathered information about the nature of the business and sought the FBO's views on delivery of official controls in the premises
- verified information about MHS staffing with the OV and/or SMHI and gathered information about operation of the premises
- observed the operation of the slaughter line and lairage, and MHS staff activities
- where slaughterhouse operating times permitted, discussed with the MHI team the aims of the OP and the OT's thoughts and findings
- held a final closing meeting with the FBO and OV/SMHI to summarise and discuss its findings

Following each visit a report was sent to the FBO and to MHS. Since the reports contain commercially sensitive information they were not distributed more widely.

#### Northern Ireland

Official controls in approved slaughterhouses in NI are delivered by DARD. The OT was requested to visit premises in NI to conduct a similar assessment of use of resources for official controls.

The OT visited 2 slaughterhouses in NI (one large mixed species and one medium sized single species).

**Excerpt from Commission Regulation 1244/2007**

**ANNEX II**

The following Annex VI b regarding official controls for the inspection of meat is added to Regulation (EC) No 2074/2005:

**"ANNEX VI b**

- (1) For the purpose of this Regulation, the following definitions apply:
  - (a) ‘controlled housing conditions in integrated production systems’ means a type of animal husbandry where animals are kept under conditions in compliance with the Annex to this Regulation.
  - (b) “Young bovine animal” is a bovine animal of either gender, which is not older than 8 months.
  - (c) “Young ovine animal” is an ovine animal of either gender, which does not have any permanent incisor erupted.
  - (d) “Young caprine animal” is a caprine animal of either gender, which is at the suckling stage and not older than 1 month of age.
  - (e) “herd” means an animal or group of animals kept on a holding as an epidemiological unit; if more than one herd is kept on a holding, each of these herds shall form a distinct unit.
  - (f) “holding” as defined in Regulation (EC) No 1760/2000<sup>1</sup>.
  - (g) “Establishment carrying out discontinuous slaughter” activities means a slaughterhouse or game handling establishment designated by the competent authority on the basis of a risk analysis, in which, in particular, the slaughter activities do not take place either during the entire working day or during subsequent working days of the week.
- (2) Post mortem inspection in establishments with discontinuous slaughter activities
  - a). By way of derogation to point (1) of Annex I, Section III, Chapter II to Regulation (EC) No 854/2006, the official veterinarian need not be present at all times during post-mortem inspection in the following circumstances:
    - (i) in establishments, which practice discontinuous slaughter activities and have sufficient facilities to detain meat with abnormalities until a final post-mortem inspection by the official veterinarian can take place and
    - (ii) an official auxiliary performs the post-mortem inspection activities and
    - (iii) the official veterinarian will visit the establishment at least once a day when slaughter activities take place or have taken place and

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<sup>1</sup> OJ L 204, 11.8.2000, p. 1

- (iv) if the competent authority has put in place a procedure to assess on a regular basis the performance of official auxiliaries in these establishments. Assessment shall include:
- a) monitoring individual performance;
  - b) verification of documentation with regard to inspection findings and comparison with the corresponding carcasses ;
  - c) check of carcasses in the storage room.
- b). The risk analysis carried out by the competent authority to identify the establishments that may benefit from the derogation mentioned in point 1 of this Article, shall at least take account of the following elements:
- the number of animals slaughtered or handled over time,
  - the species and class of animals slaughtered or handled,
  - the throughput of the establishment,
  - the historical performance of slaughter or handling activities,
  - the effectiveness of any additional measures in the food chain for procurement of animals for slaughter taken to guarantee food safety,
  - the effectiveness of the HACCP based system in place,
  - audit records,
  - the competent authority's historical records of ante-mortem and post-mortem inspections.