

## Lessons learnt from creation of MHS and benefits of centralized delivery

### Summary

1. The Meat Hygiene Service (MHS) was first established as an Executive Agency of the former Ministry of Agriculture, Fisheries and Food (MAFF) on 1 April 1995, later becoming an Agency of the FSA, on 1 April 2000.
2. The MHS took over meat inspection duties from around 300 LAs and became a single agency responsible for the enforcement of meat hygiene legislation in Britain. The great majority of staff transferred to the MHS from LAs.
3. This followed a review of options for meat hygiene in 1991/92, given concerns over LA arrangements. The centralised model was seen to remove the inconsistency of LA delivery and standards and the competitive unfairness of different charging regimes (and resourcing) by different LAs. Through the MHS focus and increased scrutiny, significant improvements in hygiene standards in meat premises were achieved.
4. The MHS faced significant challenges during its lifetime, culminating in a review of the delivery of official controls in approved meat premises in 2007, a substantial transformation programme and introduction of a new operational structure in February 2009. The new structure has provided opportunity for significant cost savings and efficiency improvements, consistency in service delivery and standards, better reporting capability and performance management. The MHS was merged with the FSA in April 2010, with delivery of official controls in approved meat premises now part of the FSA Operations Group.
5. Key benefits of a centralised model may be summarised as follows:
  - central accountability, with effective governance and clear lines of responsibility
  - opportunity for greater levels of efficiency and consistency (of particular importance if charging is introduced for the delivery of other controls)
  - real-time management information is available to allow risks to be identified and managed promptly and also drive efficiency and effectiveness.

## Introduction

6. The Meat Hygiene Service (MHS) was first established as an Executive Agency of the former Ministry of Agriculture, Fisheries and Food (MAFF) on 1 April 1995.
7. On 1 April 2000, the MHS transferred from MAFF (now part of the Department for Environment, Food and Rural Affairs – Defra) to become an Executive Agency of the newly-created Food Standards Agency.
8. From 1 April 2010, the executive agency status of the Meat Hygiene Service (MHS) was removed, and all MHS staff and functions became part of the Food Standards Agency (FSA).
9. With the MHS / FSA merger, a new FSA Operations Group was established, with delivery of official controls for approved meat premises subject to veterinary control (slaughterhouses, cutting plants and game handling establishments) across Britain now forming part of the Operations Group's remit.

## Background to the creation of the MHS

*The MHS came into being on 1 April 1995. It had responsibility for the enforcement of legislation in England, Scotland and Wales relating to public health, animal welfare at slaughter and animal health controls in licensed meat premises (and from 2006 approved meat establishments) subject to veterinary control.*

*It was established as a result of more demanding standards on inspection and enforcement, as a consequence of single market requirements from January 1993, and concern that LA arrangements were inadequate*

10. Prior to April 1995, LAs had responsibility for meat inspection and enforcement, which was administered through meat inspectors, veterinarians and Environmental Health Officers. A comprehensive review of the options for meat hygiene enforcement was carried out in 1991/92, owing to concerns over LA arrangements.
11. The LA system was considered to be failing because:
  - it was not delivering a consistent and cost-effective service to the meat industry
  - standards of enforcement and staffing levels varied widely, which lead to significant differences in charges to individual plants and complaints from industry about uneven competition

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- it did not reflect unique requirements for veterinary inspections
  - with the fragmented structure, the European Commission did not consider that the central veterinary authority (the State Veterinary Service) was able to provide the public and animal guarantees required by Community law. This led to additional monitoring by the State Veterinary Service to persuade the EC and third country export markets that necessary controls existed (this was estimated as costing £2.4m in 1993/94)
  - the State Veterinary Service monitoring in 1992/93 assessed 42% of red meat slaughterhouses and 30% of poultry meat slaughterhouses as “poor” or “unacceptable” in relation to compliance with domestic Regulations.
12. The review considered alternative options - enhancing Local Authority enforcement, independent agency enforcement and contracted out enforcement - but none of these were considered to have an advantage as far as cost.
13. Unsurprisingly proposals for a centralised meat inspection service were met with opposition, for example, with the Institution of Environmental Health Officers countering that the recruitment of inspectors, administration and associated overheads would be costly and in addition to food enforcement undertaken by LAs, increasing costs to the taxpayer.
14. Following the review, the Agriculture and Health Departments considered that the only adequate solution was to transfer LA enforcement responsibilities to a new national Meat Hygiene Service. The MAFF Minister announced the intention to create a single Agency with responsibility for meat inspection in March 1992.
15. The MHS was formed under the Government's Next Steps Agency Programme, and as an Executive Agency of MAFF was accountable to Agriculture and Health Ministers in Britain.
16. The MHS took over meat inspection duties from around 300 LAs and became a single agency responsible for the enforcement of meat hygiene legislation in Great Britain. The great majority of staff transferred to the MHS from LAs.
17. One of the main objectives in creating the MHS was to improve hygiene standards in licensed meat premises and raise public health standards. The 1995/96 MHS Annual Report and Accounts included the following benefits to consumers and the industry from the creation of a single national enforcement agency:
- the supply of a consistent, cost-effective, quality service. The MHS aimed to ensure that standards, inspection manning levels and charges in fresh meat premises were consistent across Britain
  - a centralised inspection system under veterinary supervision being more acceptable to trading partners within the EU and other countries in providing a uniform inspection service

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- a single national agency was considered to be better placed to manage changes arising from developments in hygiene assessment and risk management, so as to take meat inspection into the 21<sup>st</sup> century.

## Improving hygiene standards

18. From its creation, the MHS was set formal targets to raise hygiene standards in licensed meat premises.
19. From 1995/96 to 2002/03, delivering improvements in hygiene standards, measured by improvements in Hygiene Assessment System scores, were a key performance target for the MHS. HAS was a risk-based method of scoring hygiene standards in licensed fresh meat premises initially for slaughterhouses but later extended to cutting plants, assessing compliance in different areas (such as slaughter and dressing, personnel and practices, maintenance and hygiene, general conditions / management and ante-mortem) weighted according to their importance in influencing hygiene and public health.
20. Up until the introduction of the EC Food Hygiene legislation on 1 January 2006, use of HAS scores remained a key performance metric.
21. To provide a broad indication of the impact of MHS on compliance, a trend analysis of HAS scores is provided in **Appendix 1** for the period 1995 to 2005. A revised scoring system was introduced in July 1999. Looking at the three graphs:
  - **average plant HAS score for year** - this shows a continual increase in plant compliance from 1995 to 1998, a drop in 1999 (see below) and improvements from 1999 to a peak in 2002
  - **average HAS score per month for 1999** - this shows that the change in weighting with HAS 99 had an adverse affect on HAS scores (they decreased significantly from June to July), therefore we can reasonably assume that since the weighting change effectively 'raised' scoring criteria, then although average HAS dropped from 1998 to 1999, the change of weighting was the cause of this (first 6 months of 1999 to 1998 indicated an improvement of 0.5) and compliance did actually improve in this year, although was measured against more stringent criteria. HAS scores improved from 1999 to 2002
  - **number of plants, and breakdown of plants by average HAS score** – this shows significant improvement from 1995 to 1998, particularly in improving compliance in those premises demonstrating the worst scores (under 50), with a 97% reduction in this category from 1995 to 1998, and in the 50 to 70 range a 43% reduction. The reductions again demonstrate a blip in 1999 but continued improvement up to 2002.

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22. Slaughter of clean livestock is a key factor in hygienic dressing. The Clean Livestock Policy was published by the MHS in September 1997. It set out standards for acceptable and unacceptable levels of cleanliness for cattle and sheep being presented for slaughter. It was intended to improve hygiene standards following the fatal *E coli* O157 outbreak in Scotland in 1996. The importance of the policy was emphasised to all sectors of food production, through widespread publicity, Ministerial announcements and MHS national road shows. The policy was considered to have a positive impact on the cleanliness of animals presented for slaughter.
23. From 1997, performance targets were in place to ensure strict adherence to the Clean Livestock Policy and also to ensure that only carcasses free from contamination were health-marked.
24. With the introduction of the EC Food Hygiene legislation in January 2006, food business operators (FBOs) were required to put in place appropriate controls that demonstrated they were managing food safety within their business. This included cleanliness of animals at slaughter.

**Performance management information**

25. Up until the new structure within Operations Group was put in place, there was a wealth of data and measures available on operational delivery but very little (meaningful) management information. An important priority under the new operational structure was to ensure consistency across Britain through the development, provision, monitoring, analysis and evaluation of performance management information at establishment, cluster, business area and national level.
26. Key Performance Indicators are now in use at various levels within the operational structure.
27. A performance dashboard has been developed which focuses on key performance areas. At its highest level, it presents the overall national picture for Britain but can be drilled down further to provide performance within each Business Area / cluster and whether this is the same, better or worse than the national picture. The dashboard is now being extended to other areas of the Operations Group.
28. A wealth of other reports is also available on a routine or *ad hoc* basis – such as trends in FBO audits, cause for concern, enforcement activity. Since the establishment of the Delivery Planning Unit, significant progress has been made towards having structured systems, reliable data in a consistent format and centralised reporting.
29. A major strength is the opportunity to access and make use of *real-time* management information. This is not currently available in the de-centralised

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LA delivery model.

30. In October 2009 when a system for handling premises identified as a cause for concern was introduced, 72 (6%) of the 1,137 approved meat premises in Britain were identified as a cause for concern. The number of premises identified as a cause for concern had reduced to 38 in September 2010, from a total of 129 that have featured on the list since October 2009. The system has worked very well, with progress under the initiative exceeding expectations.

**Contingency planning**

31. For the current meat delivery platform, detailed contingency plans and are being maintained for disaster recovery of the York office and business continuity, industrial action and pandemic flu and animal disease control. Consideration is being given to how these mesh with plans in place in other parts of the FSA and opportunities to extend across the Operations Group.

**Benefits, risks and issues of current delivery platform**

32. Benefits, risks and issues of the centralised delivery platform for meat are summarised in **Appendix 2**.

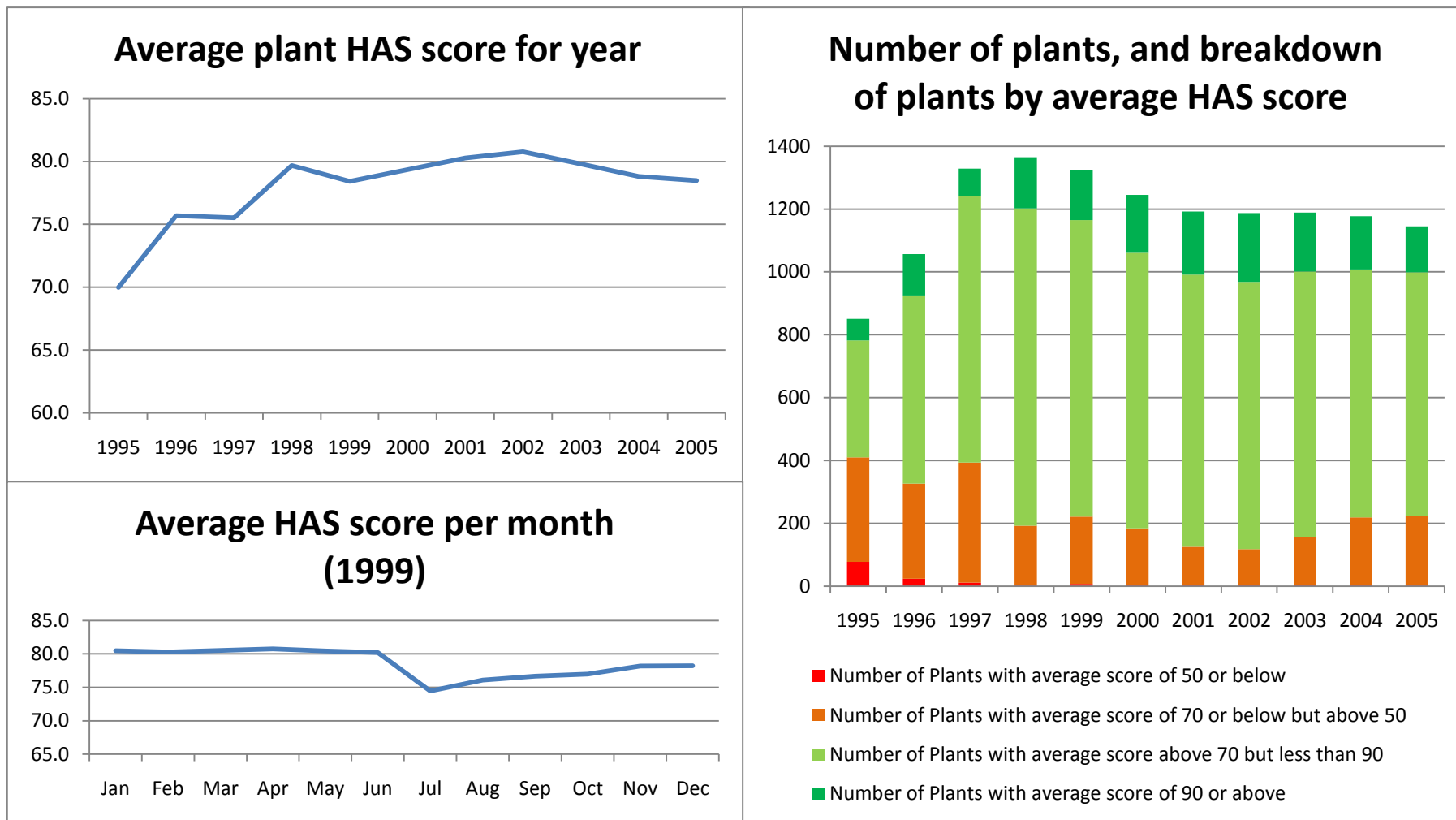
**Conclusion**

33. Given subsequent changes to the regulatory landscape and attendance requirements that happened after the MHS came into being in 1995, and of course external factors such as the BSE crisis (and introduction of increased controls), it is difficult to establish what would have happened if delivery had remained with LAs.
34. However, the MHS was established at a time when 42% of red meat slaughterhouses and 30% of poultry meat slaughterhouses were judged as being “poor” or “unacceptable” in relation to compliance with domestic legislation and the LA system was considered to be failing.
35. As demonstrated by trends in hygiene standards, there were definite improvements in compliance following the establishment of the MHS, with the MHS also having a positive impact on the cleanliness of animals accepted for slaughter.
36. These and the opportunity to apply consistent standards and practices in all fresh meat premises, lend weight to the view that centralising responsibility for meat hygiene legislation through the creation of the MHS, offered benefits to the LA model.

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37. The MHS was merged with the FSA in April 2010, with delivery of official controls in approved meat premises now part of the FSA Operations Group.
38. The new operational structure has provided opportunity for significant cost savings and efficiency improvements, consistency in service delivery and standards, better reporting capability and (real time) performance management information. These allow risks to be identified and managed promptly.

### HAS score summary 1995 – 2005



## Benefits, risks and issues of current delivery platform for meat in Britain

Benefits	Risks
<ul style="list-style-type: none"> <li>• Direct FSA control of delivery and liability for costs</li> <li>• Central accountability, with effective governance and clear lines of responsibility</li> <li>• Performance management information available in real-time, nationally and at various levels, allowing risks to be identified and managed promptly, also driving efficiency and effectiveness</li> <li>• Opportunity for consistency in delivery of official controls, approach and standards</li> <li>• Opportunity to influence frontline resources (e.g. through instructions, guidance, training, management structure and cascade)</li> <li>• Central co-ordination of approval functions for approved meat premises, ensuring consistency in decision making</li> <li>• Delivery platform better able to meet EU / FVO requirements</li> <li>• Serves consumer and public health interests through delivery of controls through independent, public sector model</li> <li>• Provides effective platform for carrying out key work on behalf of other Government Departments through SLAs (e.g. official controls for animal health and welfare for Defra)</li> <li>• Business Area / cluster geographical structure provides opportunity to maximise effectiveness of service delivery, with greater flexibility and accountability at a local level</li> <li>• Structure provides opportunity to reflect differences and sensitivities across Britain</li> <li>• Platform facilitates securing compliance (as demonstrated by improvements made through cause for concern initiative)</li> <li>• Economies of scale (e.g. IT development and infrastructure)</li> <li>• Central co-ordination of contingency planning (e.g. for notifiable disease outbreaks)</li> </ul>	<ul style="list-style-type: none"> <li>• Different delivery arrangements for UK controls regime</li> <li>• Separation between different delivery arrangements increases risk of inconsistencies in tackling non-compliances</li> </ul>