

## Farming Regulation Task Force Report: FSA response

### FSA consideration of specific recommendations made in the Farming Regulation Task Force Report

Task Force Recommendation	Accept/ accept in part/ reject	Argument	Approach in devolved countries
<b>Paperwork</b>			
<p><b>2.43</b> We recommend that Defra, its agencies and delivery partners, including the Food Standards Agency produce a coherent plan for Ministers of how they intend to further reduce and rationalise the process and paperwork for farming and food-processing businesses, with aim of improving efficiency and effectiveness. We</p>	<p><b>Partially accept – represents ongoing work</b></p>	<p>Work in this area has been ongoing for many years, with the Administrative Burden Exercise (2005 – 2010) providing a particular focus. The FSA fully accepts the importance of minimising paperwork and process burdens. This is recognised in the FSA's strategic outcomes and priorities. Between 2005–2010 FSA delivered administrative burdens savings of £151m per year. This included things such as the discontinuation of butcher's licensing, efficiency savings from meat hygiene official controls, reduction of official inspections for farms that are members of assurance schemes, and using pre-existing data to avoid farms and feed businesses having to register as food businesses. £44m was saved through guidance to aid compliance with European animal feed record keeping. Since the end of the administrative burdens</p>	<p><b>Wales, Northern Ireland</b> – Where there is merit, we will propose to devolved Ministers changes in the delivery of regulations in food businesses.</p> <p><b>Scotland</b> - On farm rationalising of inspections and recording is an</p>

<p>recommend that the plan:</p> <ul style="list-style-type: none"> <li>- is produced by the end of 2011;</li> <li>- explains where paperwork and process cannot be reduced, and address 'customer journey mapping' where it makes sense to do so; and</li> <li>- is based on the Task Force principles and recommendations elsewhere in this report.</li> </ul>		<p>initiative, the FSA has continued to seek further savings. The removal of certain labelling requirements for animal feeds resulted in further savings of £34m. In relation to FCI, which is specifically referenced by the Task Force in relation to paperwork burdens, the FSA is taking action in this area – detailed below.</p> <p>The FSA fully accepts the importance of guidance documents being as short as possible and that both guidance and forms are developed in consultation with stakeholders and that efficiency gains can be had from digital forms. We also support the usefulness of the Farming Theme on Business Link, with which we are involved.</p> <p>We do not, however, believe that a specific, separate, plan is necessary. Instead it would be more efficient to include plans for action in the plan that we will be drawing up in relation to the Red Tape Challenge exercise.</p>	<p>existing policy in Scotland and the FSA has been fully participating in Scottish Government initiatives to reduce admin burdens and inspection footfalls. For other businesses where there is merit, we will propose to devolved Ministers changes in the delivery of regulations in food businesses</p>
<p><b>Water in dairy premises</b></p>			
<p><b>6.47</b> The FSA plans to issue guidance on the use of private water supplies, including use in dairy premises, which will clarify the requirements of relevant food hygiene legislation and the</p>	<p><b>Accept – activity ongoing</b></p>	<p>Defra, the Drinking Water Inspectorate and their equivalents across the UK are responsible for the Private Water Supplies Regulations and the Drinking Water Directive. The Private Water Supplies Regulations require that commercial users of private water supplies undergo a risk assessment and implement a monitoring regime to ensure that the water meets the definition of “wholesome” in the Drinking Water Directive. These Regulations were introduced in Scotland in</p>	<p><b>Wales, Scotland, Northern Ireland –</b> Our aim is to promulgate consistent guidance across the UK.</p>

<p>relationship with the Private Water Supply Regulations. We recommend that the FSA acts promptly to issue this guidance.</p>		<p>2006, prompting the dairy farmers in Scotland to launch a campaign citing that their counterparts in the other parts of the UK had an unfair advantage as they were not required to comply with the Private Water Supplies Regulations. The Scottish Government in conjunction with FSA Scotland produced clarification which aimed to assist dairy farmers in complying with the Regulations.</p> <p>When the corresponding Private Water Supply Regulations were introduced in England, Wales and Northern Ireland in 2010, it became apparent that the same problems faced by the dairy farmers in Scotland would be encountered by those in England and Wales. The Scottish Government requested that the FSA produce guidance which should be rolled out across the UK. The FSA has been working with water regulators and agriculture departments across the UK to resolve this relatively long term issue and over the last year or so, has made good progress in developing guidance which will clarify the circumstances which 'potable or clean' water can be used during primary production which includes dairies. There are still some issues to address but we are close to finalising the guidance and, once agreement has been reached, will seek views from stakeholders.</p>	
<p><b>TSE Controls</b></p>			
<p><b>10.05</b> We recommend that the Government makes maximum use of existing</p>	<p><b>Accept – reflects ongoing activity</b></p>	<p>The FSA has responsibility for advising government on food safety in relation to TSEs and leads on policy relating to SRM controls. The FSA is working closely with Defra, who lead on</p>	<p><b>Wales, Scotland, Northern Ireland –</b> We will make</p>

<p>derogations in EU legislation, fully supports moves to more proportionate and risk-based TSE controls, and implements changes without delay once revised EU legislation comes into effect.</p>		<p>the other aspects of TSE Road Map 2. The FSA fully supports the approach taken by the European Commission in the TSE Road Map 2. FSA will continue to reduce controls where supported by scientific evidence and robust risk assessments whilst ensuring that effective consumer protection is maintained. For example, the FSA Board recently agreed to the raising of the age threshold for BSE testing of healthy cattle slaughtered for human consumption in May 2010 and in September 2011 advised on proposals to ease aspects of the feed ban relating to the use of non-ruminant protein in feed. Where changes have been agreed at EU level, these have been implemented without delay as soon as the EU legislation permitted.</p>	<p>recommendations to Ministers across the UK to reduce controls where this is supported by the science.</p>
<p><b>10.06</b> We recommend that official controls on BSE testing and SRM removal in abattoirs are reviewed to ensure that they are fully risk-based (not 'tick-box') and take account of the FBO record of compliance.</p>	<p><b>Accept – reflects ongoing activity begun in 2007</b></p>	<p>FSA keeps the official BSE controls in approved premises under review, to ensure that they remain proportionate and take risk factors into account, while maintaining a high level of consumer protection.</p> <p>In 2007 FSA began the process of introducing more risk-based official supervision of BSE controls with under thirty months cattle and sheep, extending this to include OTM cattle in 2009. Examples of the changes made are:</p> <ul style="list-style-type: none"> <li>• Introducing risk based checks on separation, staining, storage and disposal of SRM.</li> <li>• Transfer of responsibility for dentition checks to age sheep and goats to the FBO.</li> <li>• Allowing cold inspection in small plants with good</li> </ul>	<p><b>Wales, Scotland, Northern Ireland –</b> We will make recommendations to Ministers across the UK to reduce controls where this is supported by the science.</p>

		<p>compliance record.</p> <ul style="list-style-type: none"> <li>• Replacing full time official presence in cutting plants removing SRM bovine vertebral column with risk based daily or random checks.</li> <li>• Replacing 100% official checks on cattle ID with a risk based audit of FBO checks.</li> <li>• Removing the requirement for abattoirs handling 30 – 48 month bovines to have a required method of operation (RMOP).</li> </ul> <p>The risk based approach also takes into account the FBO's track record of compliance such as, for example, with the staining and spinal cord requirements.</p>	
<p><b>10.07</b> We recommend that the domestic TSE regulations are changed to take advantage of the existing derogation in EU law, which permits authorised cutting plants to harvest head meat.</p>	<p><b>Under consideration – research began in 2008, report available summer 2011</b></p>	<p>The FSA restricted harvesting of bovine head meat to slaughterhouses because of concerns about the potential contamination of the heads with central nervous system (CNS - brain and spinal cord) tissue during movement and transportation.</p> <p>The FSA is already in the process of reviewing this restriction, in liaison with industry, and has funded research to assess contamination from CNS on bovine head meat. Discussions with industry have shown that, to date, there is one cutting plant interested in harvesting head meat. The report of this project is to be published shortly and will inform the FSA's consideration of whether or not to apply the EU derogation in</p>	<p><b>Wales, Scotland, Northern Ireland –</b> We will make recommendations to Ministers across the UK to reduce controls where this is supported by the science.</p>

		the future.	
<b>Earned recognition - general</b>			
<p>We recommend adoption of the approach of 'earned recognition'. This is about giving official recognition to the effective efforts made by individuals and businesses in understanding legal requirements and getting things right. Adopting and applying this principle of earned recognition should reduce the burden on business and should help regulators to make risk-based decisions and to make better use of their expertise.</p>	<p><b>Accept – Enforcement strategy initiated in Autumn 2010</b></p>	<p>The FSA is developing a compliance and enforcement strategy which aims to deliver sustained improvements in compliance by food businesses. This includes developing a better understanding of what works to improve compliance in businesses and targeting controls to higher risk non-compliant premises. A key component of this is through 'earned recognition' where businesses' own means of securing compliance provide for a reduction in the type and/or frequency of regulator interventions, where those systems address legislative requirements.</p> <p>The approach the FSA has already established with Red Tractor scheme for hygiene of primary production and hygiene inspection in the dairy sector provide useful models. A Memorandum of Understanding was signed in January 2009 when we started to take AFS membership into account where regular independent verification of standards by accredited bodies have been utilised to provide improved intelligence on risk and evidence on standards within businesses. The dairy inspection model will deliver significantly reduced burdens on lower risk businesses in the sector. The approach necessitates partnership working by all parties based on trust and greater transparency and openness- essential to ensure that consumer protection is still</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>

		<p>maintained, whilst allowing regulators to focus attention and resources on higher risk non-compliant businesses.</p> <p>We already reflect the principles behind earned recognition and the notion of “consistently competent” premises to a significant extent in the audit process, as the audit frequency for a plant is determined by, amongst other things, a risk assessment which also takes into account the compliance record. However, we continue to work on this issue and are researching whether accredited third-party schemes can be utilised to inform risk assessments and ultimately inspection levels.</p>	
<p><b>Earned recognition and meat hygiene</b></p>			
<p><b>10.08</b> We recommend that the Government supports moves to more proportionate and risk-based meat hygiene controls and inspection that take account of earned recognition.</p>	<p><b>Accept – ongoing activity.</b></p>	<p>The FSA is actively involved with the EU Commission and other Member States in reviewing current meat controls, with a view to developing new controls for the future that will be more risk based and proportionate. Whilst future EU legislation is likely to continue to require a degree of Competent Authority presence/controls in meat establishments, the Commission seems prepared to consider changes to the nature of these controls and who might carry them out, and it may therefore be possible to take fuller account of earned recognition in a future system of controls once it is clear what controls will be required.</p> <p>The FSA is also reviewing with industry stakeholders the</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>

		<p>flexibilities that can be applied to official meat control delivery under the present EU legislation and, as part of this work, will consider the application of earned recognition principles where there is scope to do so.</p> <p>In the current legislative framework, the key principles behind earned recognition and the notion of ‘consistently competent’ premises forms part of the audit process, as the audit frequency for a plant is determined by, amongst other things, a risk assessment which also takes into account the compliance record. We agree to consider further whether earned recognition, including accredited third-party schemes, can be used in the meat industry within the confines of current legislation.</p>	
<p><b>10.15</b> We recommend that consistently competent FBOs should be able to use accredited private sector bodies to provide meat inspection services. We recommend that the FSA should approve and designate these accredited private-sector bodies as control bodies.</p>	<p><b>Partially accept. The use of private sector bodies and control bodies was first discussed as part of the Tierney Report response in 2007</b></p>	<p>With regard to the use of control bodies to deliver official controls, there are a number of legal limitations to this at present, e.g. the enforcement functions contained in article 54 of Regulation 882/2004 cannot be delegated to a control body. Therefore, if a control body, or control bodies, were to be introduced it would require a two tier system to deliver front line official controls, one to deliver official inspection and audit, and one to deliver official controls to deal with non compliance. In addition, the nature of official meat controls is likely to change species by species over the next few years with the first changes expected as early as 2012. It will be important to clarify what controls will be required in future before proceeding to identify how those controls can be delivered. We will continue to actively engage with the European Commission in the review of the design of future</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>

		<p>meat controls and on the review of the legislation that covers the requirements for the delivery of official feed and food controls (882/2004), including the definition of control bodies. In addition we will work with industry as this programme develops to explore what controls are needed and who carries them out.</p> <p>The FSA will consider a persuasive case from industry, providing support and advice as appropriate, on alternate model(s) that can provide suitable assurance and detail across a number of areas including the level of public health protection, its long term sustainability, any legal implications of the model, its viability and cost to the taxpayer</p>	
<p><b>10.17 We recommend that a joint industry/official group with an independent Chair considers the criteria for accepting provision of meat inspection services by accredited third parties and reports to FSA as soon as possible.</b></p>	<p><b>Reject at this stage</b></p>	<p>The FSA, working with industry, will continue to focus on engaging with the EU Commission review of hygiene regulations, which will give clarity on the future shape of official meat controls.</p> <p>The FSA will however consider a persuasive case from industry, providing support and advice as appropriate, on alternate model(s) that can provide suitable assurance and detail across a number of areas including the level of public health protection, its long term sustainability, any legal implications of the model, its viability and cost to the taxpayer.</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>
<p><b>10.19 We recommend greater use of cold inspection for small abattoirs.</b></p>	<p><b>Accept - agreed policy since 2008</b></p>	<p>Cold inspection was introduced in small red meat abattoirs in July 2008, as part of the more risk-based approach to BSE controls. We agree that industry and the FSA should work together to ensure that this flexibility is used whenever it is possible to do so, on a case by case basis.</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>

		A guidance leaflet for FBOs explaining the requirements for allowing 'cold inspection' was published in July 2008 and this was updated in 2009 when the scheme was extended to include cattle over 30 months of age.	
<b>10.20</b> We recommend that the FSA continues to work with industry to develop trials of innovative inspection arrangements.	<b>Accept – trials begun in 2008 for indoor pigs and 2010 for lambs.</b>	The FSA has been working with industry on trials of innovative inspection arrangements, such as widening the use of visual inspection in various species. We will continue to conduct this research and take forward the findings.	<b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.
<b>Various meat hygiene recommendations</b>			
<b>10.22</b> We recommend reviews of the following elements, where there appear to be issues of consistency, flexibility or propriety that should be addressed:			<b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.

<ul style="list-style-type: none"> <li>consistency in permitted process for sterilising knives etc in abattoirs and cutting plants</li> </ul>	<b>Accept – ongoing implementation</b>	<u>Knife sterilisation:</u> The FSA considers that it is appropriate to allow local authorisation of alternative systems in cutting plants and has taken a flexible approach to implementation since 1 <sup>st</sup> January 2006, when the hygiene legislation required water at 82°C to be used for disinfecting knives in slaughterhouses and cutting plants or an alternative system having an equivalent effect. Since 2006, we have received one application to consider an alternative system for the disinfection of knives in one slaughterhouse. The letter authorising the proposed alternative was issued on 27 June 2011. Slaughterhouses pose a higher risk than cutting plants as the working environment is dirtier and no animals have at that point passed post mortem inspection. For the present, we consider requests for alternative systems in slaughterhouses on a case by case basis. We are in addition currently reviewing the process for approving other systems. This may however change with greater knowledge and experience of alternative systems.	<b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.
<ul style="list-style-type: none"> <li>inspection arrangements for udders and testicles</li> </ul>	<b>Accept</b>	<u>Inspection for udders and testicles:</u> Visual inspection only of the genital organs of cattle is required (except for the penis, if already discarded) and the udder is subject only to visual inspection if not intended for human consumption. The FSA will explore with industry what practical issues are associated with visual inspection of the udder and testicles.	<b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.

<ul style="list-style-type: none"> <li>greater flexibility for FBO staff to inspect and approve young animals and offal</li> </ul>	<p><b>Accept</b></p>	<p><u>FBO staff inspection of young animals and offal:</u> FBO staff may currently highlight any abnormalities in live animals of all ages to an official, but under the current EU hygiene legislation final approval and outcome of inspection of live animals, carcasses and offal must be carried out by an official (OV or OA).</p> <p>The FSA's Future Meat Controls programme has funded research since Spring 2010 to review aspects of the current system of meat inspection in terms of public health, animal health and animal welfare. This research will inform our future policy on what official controls could be carried out in slaughterhouses</p> <p>The current EU legislation provides flexibility for post mortem procedures for young animals to be reduced to mainly visual inspection provided certain conditions are met. We will explore with industry whether this flexibility could usefully be applied</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>
<ul style="list-style-type: none"> <li>arrangements for moving edible co-products between licensed meat premises</li> </ul>	<p><b>Accept – already allowed in legislation</b></p>	<p><u>Moving edible co-products between licensed meat premises:</u> Movement of edible co-products between premises is allowed within the constraints of food hygiene and animal by-products legislation, taking account of the condition of the material concerned.</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>
<ul style="list-style-type: none"> <li>adopting risk-based controls to regulate the period between slaughter and minced-meat</li> </ul>	<p><b>Accept – evidence gathered over a number of years on risk based controls.</b></p>	<p><u>Age of meat for mincing:</u> The FSA believes that the time limits prescribed in the food hygiene legislation, within which minced meat made from chilled meat can be prepared, does not fit with the risk based approach to food hygiene advocated in that legislation. For some years, the FSA has been collecting</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the</p>

<p>production</p>		<p>and evaluating the evidence on minced meat production to identify appropriate risk based controls that could be applied to allow minced meat made from chilled aged meat, to be produced safely. A review of the available literature was commissioned in 2006 and then a research project in 2010 to generate data to strengthen the evidence base. Early findings were sent to the Commission in July 2010; further supporting data from industry will be sent to the Commission later this year with a request that the Commission services consider an amendment to the food hygiene legislation. The FSA has also issued guidance to enforcement officials on this aspect of the EU food hygiene legislation to ensure an appropriate and proportionate risk based approach to enforcement.</p>	<p>UK.</p>
<p>10.27 Consistent with the overall principles of this report, we agree that trichinella controls should derive from a proportionate risk-based approach. Therefore <b>we endorse EFSA's review into trichinella controls.</b> The review aims to achieve this approach and clarify the criteria for regions of negligible risk. We acknowledge that a risk-based approach may well involve increased</p>	<p><b>Accept</b></p>	<p>The FSA fully supports the EFSA review into Trichinella controls and agrees that future controls and the criteria for negligible risk should be proportionate and risk based. We have provided research to EFSA, setting out how a risk-based portfolio of evidence can be used to demonstrate negligible risk, to inform these deliberations. Testing requirements for a future UK case for recognition as a region of negligible risk will depend on the scientific evidence and will need to meet the criteria once they are established. We are working with industry to explore how further testing of pigs, particularly outdoor pigs which are the highest-risk group, can be achieved.</p>	<p><b>Wales, Scotland, Northern Ireland –</b> reflects the position across the UK.</p>

<p>testing of certain parts of the pig population, such as outdoor pigs. Although this would support a future resubmission of the UK case for negligible risk (which, if secured, would benefit the industry), we feel that the current testing regime provides a sound basis for identifying trichinella in the UK. Any further testing would seem excessive.</p>			
<p><b>Antibiotic failures in milk and milk from TB-reactors</b></p>			
<p><b>10.24</b> We recommend that the FSA should reopen discussions with the European Commission about the interpretation of legislation relating to antibiotic failures in milk. We recommend that Defra and the FSA should work with industry to establish a suitable way forward for disposing of milk that has failed antibiotic tests.</p>	<p><b>Partially accept – issue under ongoing consideration</b></p>	<p>The FSA accepts the recommendation to work with Defra and other stakeholders to ensure there are suitable disposal routes for milk that has failed antibiotic tests.</p> <p>The Task Force notes that there is a perception that the UK is interpreting the current EU rules on antibiotic failures in milk more strictly than other Member States (MS). The current requirements regarding antibiotic testing are based on EC Regulations which apply directly to all MS. The wording of the regulation is fairly general, requiring food business operators to ensure that milk is not placed on the market if it contains antibiotic residues exceeding authorized levels. Following a FVO inspection in 2006, the European</p>	<p><b>Wales, Scotland, Northern Ireland –</b> Consistent guidance is in place across the UK. Our preferred approach of stakeholder engagement will take place across the UK.</p>

		<p>Commission and FVO had a clear view that practices previously in place in the UK did not comply with the legislation. The FSA was under pressure from the Commission to address this issue and therefore published guidance on antibiotic testing which reflected the Commission Decision that prohibits the placing on the market of curd cheese manufactured in a dairy establishment in the UK. This guidance, published in April 2009, aimed to provide clarification to food business operators on the requirements of the EU regulations which require producers to ensure that milk from animals under treatment or in the withdrawal period does not enter the food chain. The FSA planned to review the guidance if further advice was provided by the Commission. No further advice has been issued and there is no indication that the Commission has changed its position.</p> <p>Our preferred approach is to consider the recommendation further with industry and consumer stakeholders and possibly with other Member States before deciding whether it is appropriate to re-open discussion with the European Commission.</p>	
<p><b>10.25</b> We recommend that Defra, the FSA and dairy trade associations should open discussions on how pasteurised milk from TB-reactor cows could safely enter the food chain.</p>	<p><b>Further consideration needed – review commissioned in July 2010</b></p>	<p>The FSA needs to liaise with Defra officials to consider this issue carefully before establishing whether to accept or reject this recommendation.</p> <p>In July 2010 FSA Board asked for a review of the potential risks to consumers from meat and milk from cattle with evidence of <i>Mycobacterium bovis</i> infection. This will help establish public health impact associated with relaxing the current restrictions on milk from TB reactors. These</p>	<p><b>Wales, Scotland, Northern Ireland –</b> We will hold parallel discussions with devolved rural affairs Ministers in the light of the current review. [However, in</p>

		<p>restrictions contribute to a series of controls which aim to minimise the food safety risks and eradicate the disease in animals. The potential impact on controls which prevent the spread of TB in animals also needs to be considered to ensure animal health and public health controls support the holistic approach to tackling disease in primary production. The results are due to be presented to the FSA Board by the end of 2011.</p> <p>The EU Food Hygiene Regulations clearly state that milk from individual animals showing positive reaction to the tuberculosis test must not be used for human consumption. Allowing milk from TB-reactor cows to enter the food chain would therefore require a change to the hygiene legislation and, given the current emphasis on TB control and eradication, we would not expect the Commission to be receptive to relaxing the current requirements and we have concerns about the Commission's reaction to an approach on this issue.</p>	Scotland given the current TB free status of Scottish herds this might not be necessary]
<b>Abattoirs</b>			
<b>10.29</b> We recommend a dialogue between the haulage industry, abattoirs and the FSA to ensure that abattoirs provide vehicle-washing facilities in line with their obligations, and appropriate actions are	<b>Partially accept – ongoing issue</b>	Some former low throughput slaughterhouses are now exempt under national measures from the need to provide these facilities. In the first instance, the FSA would consider that this is a matter for resolution between the FBO and the haulier if the facilities at a particular slaughterhouse are deemed to be inadequate by the haulier. However, the FSA would be happy to discuss issues which cannot be resolved, on a case by case basis. The FSA has had discussions with	<b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.

<p>taken against those that do not provide adequate facilities.</p>		<p>the Road Haulage Association and Defra on this matter in the past, we last met with the Road Haulage Association at their request in January 2009.</p>	
<p><b>10.30</b> We recommend that the FSA should review the opinion, including the risk assessment, and discuss with Ministers whether the UK should press for revised arrangements to allow for greater recycling of water in slaughterhouses.</p>	<p><b>Partially accept – ongoing engagement with the European Commission</b></p>	<p>Recycled water can be used for cleaning parts of slaughterhouses, such as the lairage and poultry crates. EU legislation is not prescriptive with regard to the use of recycled water in other places, such as for the first part of the cleaning process of the slaughterhall floors, provided that any equipment which comes into contact with fresh meat is thoroughly cleaned and disinfected afterwards (usually by using potable water and disinfectant). The use of recycled water in these cases must be verified by appropriate HACCP procedures and animal health cannot be compromised.</p> <p>With regard to the use of recycled water used in processing, such as for reducing the surface contamination of carcasses, this is being considered by the European Commission at present. The FSA has engaged fully with this review and will continue to work with industry and the Commission on this matter.</p>	<p><b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.</p>
<p><b>Food Chain Information</b></p>			
<p><b>10.39</b> We recommend that existing information from contractual arrangements between producers and</p>	<p><b>Partially accept – issue already under consideration with</b></p>	<p>Current EU hygiene legislation already stipulates that it is not necessary for the slaughterhouse operator to request certain elements of the required food chain information (FCI), such as the health status of the holding or the animals' health</p>	<p><b>Wales, Scotland, Northern Ireland –</b> The research we are commissioning</p>

<p>slaughterhouses, and/or farm assurance schemes, should replace the need for food chain information requirements.</p>	<p><b>research project being commissioned</b></p>	<p>status, if he is already aware of that information through a standing arrangement or quality assurance scheme. However, under the current EU rules, these arrangements could not entirely replace the need for relevant FCI.</p> <p>In practice, the FSA has sought to implement the requirements for food chain information in such a way that the minimum requirements can be met simply and easily using model documents thereby minimising the burden on food business operators. However, there are still EU requirements to provide FCI so the Task Force recommendation could not be implemented without a change to EU law and as such would not be a change that could be introduced in the short term.</p> <p>In addition, it is possible that the European Commission will move towards risk-based meat controls based on harmonised epidemiological criteria. Within this there may be some scope for information from producers or assurance schemes to provide information on the health status of animals, but a continued requirement for FCI is likely to be necessary if we wish to achieve the main objective of moving to a more risk based, proportionate system of meat controls.</p> <p>In order to consider the Task Force recommendation, we would need to be able to demonstrate to the European Commission that contractual arrangements or assurance schemes provide an equivalent level of information and public health protection. We are in the process of commissioning a research project to evaluate the implementation of FCI and</p>	<p>will allow us to consider further the case for change across the UK.</p>
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		CCIR (Collection and Communication of Inspection Results). The research will also look at links with other information systems, including herd health plans and third party assurance schemes, with a view to identifying whether these can be integrated into FCI, or replace all or part of it. We anticipate that the results of the research will be delivered by March 2012.	
<b>Imports</b>			
<b>10.45</b> We recommend that the FSA work with trade bodies, ports and designated laboratories to minimise delays of products produced to internationally recognised standards. <i>[Relates to high risk products of non-animal origin imported into the EU from third countries.]</i>	<b>Accept-pilot monitoring exercise initiated</b>	This FSA initiated a pilot monitoring exercise on 1 April 2011 at UK designated points of entry to verify the compliance of certified consignments (to internationally recognised standards) with permitted levels of pesticides residues. This pilot is underway to establish the evidence as to the effectiveness of accredited certification schemes to ensure compliance with the permitted levels of pesticide residues on products subject to increased checks and sampling under the relevant EC Regulation. This will inform subsequent actions that will address this recommendation.	<b>Wales, Scotland, Northern Ireland –</b> This is our policy position across the UK.