

# UK-wide Food Standards Agency and Food Standards Scotland Meat cutting plant and cold store review

## Workshop Feedback October 2018



# Introduction

This report is a summary of the work produced from the workshops held as part of the review into meat cutting plants and cold stores (MCPCS) being conducted by the Food Standards Agency (FSA) and Food Standards Scotland (FSS).

As part of the review, six workshops were held across the UK to help gather views from meat industry stakeholders.

The aim of these workshops was to identify common issues in the meat sector and consider ways in which they could be overcome.

To achieve this groups of participants explored specific industry scenarios, such as a business owner wanting to expand their meat processing business or an authorised officer wanting to improve how they manage interventions.

From these perspectives they identified where problems or pain points arose as they walked through different processes. They then suggested and developed potential solutions to these problems.

A wide range of stakeholders were invited to the events and with almost 100 attendees from 74 different businesses. Representative bodies and regulators worked together using their knowledge and insight to identify problems and develop potential solutions. We thank all the stakeholders who contributed their time, energy and expertise to these events, which helped to make them a success.

The outputs from these workshops have been analysed along with responses from the surveys of local authorities (LAs) and food businesses operators (FBOs). This feedback will play a critical role in shaping the final recommendations of the Review.

**To note: The outputs were produced by the workshop attendees and not by the FSA or FSS.**

## Background on the review

The FSA and FSS are responsible for providing assurance to consumers that all food businesses in the sector are meeting their legal obligations to produce safe, authentic food that satisfies hygiene and welfare standards.

The review, [announced on 1 February 2018](#) aims to improve levels of public confidence in the safety and authenticity of UK meat, and identify potential improvements in the way the sector is regulated in the wake of serious non-compliance issues identified at various cutting plants.

To read further details about the review please visit the dedicated webpages by the [Food Standards Agency](#) and [Food Standards Scotland](#).

# Workshops: Locations and attendees

## Locations

The workshops were held between 31 July and 16 August in the following locations:

**England:** London, Birmingham and York

**Wales:** Llandrindod Wells

**Northern Ireland:** Belfast

**Scotland:** Edinburgh

## Organisations which attended

A P Jess Ltd

Aberdeen City Council

ABP Food Group

Aldi Stores Ltd

Anglesey County Council

Armagh City, Banbridge and Craigavon Borough

Council

Association of Meat Inspectors

Assured Food Standards

Birmingham City Council

BRCA Global Standards

Bristol City Council

British Frozen Food Federation

British Meat Processors Association

Caerphilly County Council

Ceredigion County Council

Chartered Institute of Environmental Health

Chilled Food Association

Co-operative Group

Cornwall Council

Cranswick Country Foods

Cutting Edge Services

Dalehead Foods

Department of Agriculture, Environment and Rural Affairs

Dunbia

Eville & Jones

Food and Drink Federation

Food Storage and Distribution Federation

Glasgow City Council

Granville Food Care Ltd

Gwynedd County Council

Hallmark Scotland

Harrogate Borough Council

Horsham District Council

IMS of Smithfield

Institute of Food Science and Technology

International Meat Trade Association

John Sheppard Butchers Ltd

Lisburn and Castlereagh District Council

Livestock and Meat Commission for Northern Ireland

Merthyr Tydfil County Council

Michael Malone of Edinburgh Ltd

Mid and East Antrim District Council

Monmouthshire County Council

Moy Park Ltd

National Craft Butchers

National Farmers Union of Scotland

National Federation of Meat & Food Traders

Newby Foods Ltd

Newport City Council

NI Pork & Bacon Forum

North East Lincolnshire Council

North Yorkshire County Council

Northern Ireland Meat Exporters Association

Owen Taylor & Sons Ltd

Pembrokeshire County Council

Powys County Council

Provision Trade Federation

Robertson's Fine Foods Ltd

Rother & Wealden DC

Samworth Brothers Ltd

Sandyford Abattoir

Scott Brothers

Scottish Association of Meat Wholesalers

Scottish Craft Butchers

Scottish Federation of Meat Traders Association

Scottish Government

Slough Borough Council

Trafford Borough Council

Tulip / Danish Crown

UKHospitality

Ulster Farmers Union

Veterinary Public Health Association

WD Meats

Weddel Swift Distribution Ltd

# Methodology and format of the workshops

## Defining the scenarios

The workshops asked stakeholders to adopt the perspective of some of the main stakeholders or individuals involved in the operation and regulation of this aspect of the meat industry.



Some of the suggested individuals included: an FBO, technical manager, trading standards officer, environmental health officer (EHO), official veterinarian (OV) and unannounced meat hygiene inspector.

## Highlighting the problem

Attendees were asked to consider where the issues and problems would be in the current regulatory system from the perspective of that individual.

To provide focus for this activity attendees were asked to consider three distinct areas: approvals (green), oversight (orange) and enforcement (red).





Groups took their selected individual through the steps involved for the scenario and described the tangible challenges they faced and the specific problems or pain points they would have to overcome at each stage.

An example would be an FBO who wishes to expand their business needs information on the different regulation that might apply (a tangible challenge), but they may find this is more complicated than initially anticipated (a specific pain), which leads them to become frustrated.

Groups then individually ranked these problems in terms of the most burdensome for their chosen individuals.

### Developing solutions

To begin to develop solutions each attendee put forward multiple suggestions to address the problems their group had detailed, from simple straightforward solutions to radical proposals. The groups then settled on the solutions which were most commonly suggested or were the most likely to resolve the problem.

Finally, each group took forward three solutions outlining what would be required to deliver the change and what the hurdles might be.



### Feedback on workshop format

We gathered feedback on the workshops themselves, which was generally supportive of the process, while the critical feedback has offered another valuable source of insight for consideration. Below is a selection of some of the positive feedback about the process gathered during the workshops.

‘Everyone has a say of their ideas – an inclusive method’  
**Llandrindod Wales**

‘General format and process is really informative and raises interesting questions’  
**Edinburgh**

‘Good to mix everyone up – FBO/EHO/FSA ... Completely different type of workshop – it was interesting to approach things in a different way’  
**Birmingham**

‘Comprehensive coverage of key issues about regulation from legislation to application including interpretation’  
**York**

‘Format worked well. A very positive experience. I enjoyed the methodology and the approach’  
**London**

‘New way of working. Innovative’  
**Belfast**

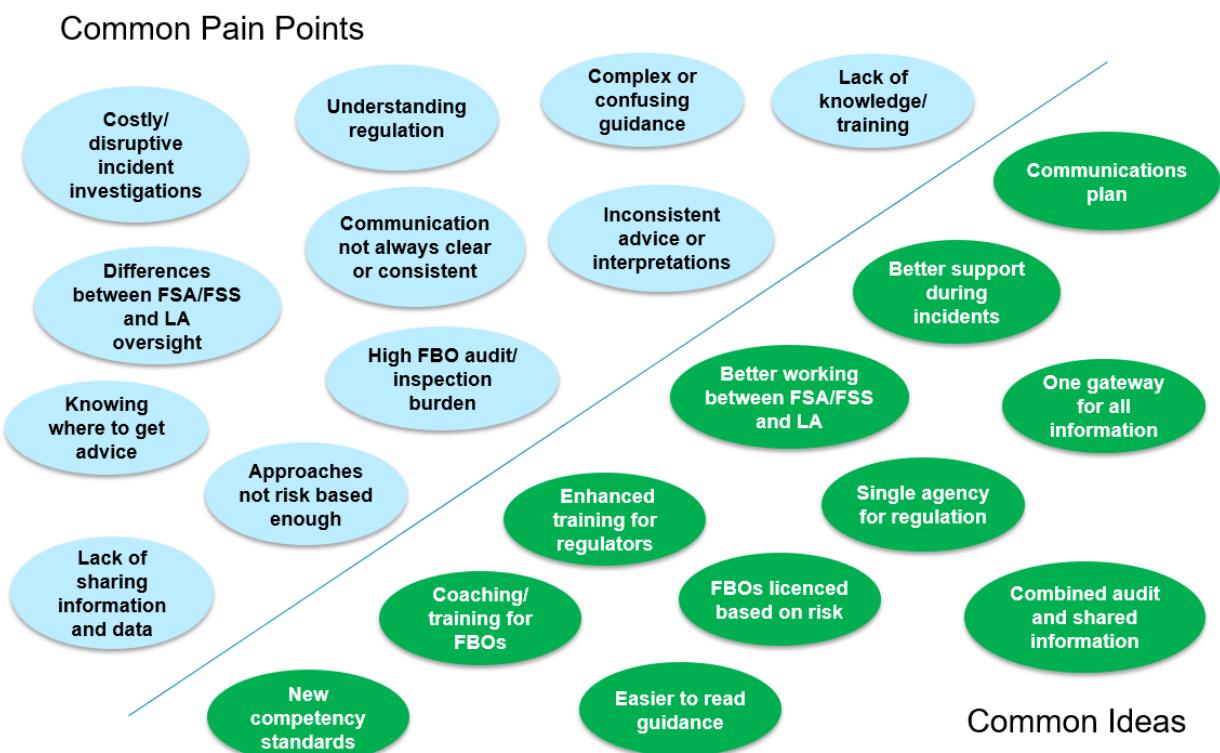
# Workshop review feedback

## Overall highlights

- There were 11 different groups of stakeholders across the six workshops
- These groups covered 23 different 'scenarios' each looking at a specific context or scenario from the perspective of an individual in the industry
- Overall there were a diverse selection of contexts adopted with nine different variations of scenarios
- Groups were drawn towards adopting the perspective of industry, with the majority looking in detail at how issues affect FBOs
- The most common contexts were related to:
  - FBO supervision by FSA / FSS / LA
  - incident management
  - advice and guidance
- Other review feedback from attendees was also captured and discussed

## Common pain points and ideas identified by attendees at the workshops

In the following figure and over the page there is a general summary of the common pain points and ideas that were raised at the workshops by attendees.



Workshops identified a number of common pain points/issues in the current approach including:

- Guidance being considered too complex and ambiguous resulting in confusion for FBOs between what is legislation, guidance and advice
- Some inconsistency in advice and the interpretation of legislation by different professionals
- Differences in approach between FSA/FSS and LAs, and dealing with both for food hygiene and food standards
- Approach not considered to be related to relative risk
- The high level of disruption, cost and audit burden for FBOs and during incidents
- A perceived lack of consistency and open communication between regulators and FBOs



In response, attendees identified a number of potential solutions/ideas:

- Collaboration with industry to develop simplified, business friendly guidance, which is available in various forms and easily accessible
- Consistent interpretations of guidance and advice
- New competency standards for inspectors and auditors, with enhanced ongoing training available to a variety of stakeholders
- All regulation and enforcement to be the responsibility of one agency regardless of the size of the FBO for each premise
- Combined audit and shared audit information between regulators
- Agree a communication plan, particularly when incidents occur
- FBOs licenced based on risk



## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### Workshop outputs arranged by scenario

**The following pages contain summarised feedback produced by the workshop attendees and were not produced by the FSA or FSS.**

The outputs have been categorised by similar scenarios that groups choose to examine, as outlined in the tables below.

#### Food business operator (FBO) scenarios

<b>Code</b>	<b>Scenarios chosen by groups</b>	<b>Occurrences &amp; workshops covered at</b>
A1	Seeking to expand business and therefore likely to or will move from LA registration to FSA approval	3 - London, Belfast, Birmingham
A2	Looking for guidance on FSA/FSS supervision, including advice and guidance	9 - London, Birmingham, Wales, Edinburgh, York
A3	Looking to improve incident management	4 - London, Belfast, Birmingham, York
A4	Ensure business passes an unannounced inspection	1 - Birmingham
A5	Looking to reduce their costs while still maintaining safe food production	1 - Edinburgh

#### Environmental Health Officers (EHO) scenarios

<b>Code</b>	<b>Scenarios (how many of each variation)</b>	<b>Occurrences &amp; workshops covered at</b>
B1	Seeking to improve how interventions are carried out by the LA	1 - York
B2	Helping an FBO to transition from LA registration to FSA approval	2 – Wales

#### Official Veterinarians (OV) scenarios

<b>Code</b>	<b>Scenarios</b>	<b>Occurrences &amp; workshops covered at</b>
C1	Carrying out unannounced inspection	2 - Edinburgh, Belfast
C2	Carrying out approvals work	1 - Edinburgh

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **A1 – Food business operator seeking to expand business and therefore likely to or will move from LA registration to FSA approval**

*Raised three times at London, Belfast and Birmingham workshops.*

#### **Scenarios:**

Ambitious FBOs looking to expand their business, which will mean a move from LA registration to FSA approval. They are unaware what this will involve and where they can get information from.

#### **Pain points identified:**

Understanding the limits that determine where FSA approval will apply, which may seem arbitrary and not based on risk.

Understanding different standards that will apply.

Guidance is ambiguous, too complex or a nightmare.

Process takes too long and is too expensive.

#### **Potential solutions**

Create alignment between multiple agencies. Agreement by LAs and FSA/FSS over transition of FBOs, with shared regulation over transition (MOUs) and better sharing of information.

Simplified, business friendly guidance in various accessible forms.

One body to deal with all premises regardless of size or category. Remove limits and restrictions, and inspect all premises on risk.

Financial assistance from Government for business development.

Review of national policy and guidance so that they're clearer, simpler and easier for all to understand and comply.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### A2 – Food business operator looking for guidance on FSA/FSS supervision, including advice and guidance

*Raised nine times at London, Birmingham, Wales, Edinburgh and York workshops.*

#### Scenarios

FBO needs to be confident that they are running a safe, compliant business and that they fully understand the regulations, and where possible reduce inspections by improving compliance.

#### Pain points identified

Confliction or confusion between guidance, legislation and advice and fear of the repercussion for getting something wrong.

Knowing where to get trusted, timely, consistent and practical advice.

Difficulty in dealing with FSA/FSS for food hygiene and LAs for food standards.

Inconsistency in audits and inspections, training for staff and delays in the FBO receiving audit reports.

Difficulty for smaller businesses to form relationships with the regulators.

#### Potential solutions

##### **Improved guidance developed with industry**

Re-develop the guidance in collaboration with industry, with clear reference to the science and proportionality which distinguishes between legal requirements and guidance. Trial it before introducing it.

Introduce a framework for standards, including what is fundamental and what is aspirational, and define this clearly. Create an industry focus group to help develop a common ground for auditing standards.

Develop more opportunities for knowledge sharing including training events, case studies and lessons learned. FSA/FSS to have more of an advisory role and not just as a regulator.

##### **Develop a sector portal for guidance and information**

Sector specific portal which places all the relevant guidance and links to the regulations with on-line training facilities. Let users have their own accounts with incentives for helping to develop guidance. Use this system to communicate audit and inspection reports to FBOs.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **Reviewing competency and qualifications for inspectors and auditors**

All regulation should be the responsibility of just one body regardless of the size or role of the meat FBO.

Review the qualifications and competency requirements of inspectors and auditors.

Work with industry to create a placement scheme for inspectors in different industry areas to develop process understanding.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **A3 – Food Business Operator looking to improve incident management**

*Raised four times at London, Belfast, Birmingham and York workshops.*

#### **Scenarios**

FBO wants to ensure that they have a robust incident management system in place and can respond to an incident quickly and efficiently.

#### **Pain points identified**

Inconsistent interpretation of the legislation by enforcement and the extent of problem.

Disruption during external investigation or withdrawals resulting in cost and reputational damage.

Communication is not always timely, clear or consistent and not updated or shared.

Clear guidance and requirements as to the issues which created the incident.

Better decision and risk analysis for FBOs, and lack of confidence in ensuring a level playing field.

#### **Potential solutions**

##### **Agree a communication plan at Partnership Working Group (PWG) for incidents**

Make the PWG the main focus for communication of information at incident and develop links with other stakeholders via the group. Agree a communications plan based on a template and run mock exercises around incidents regularly to ensure consistent messages.

##### **Ensure there is evidence of the problem early on so that all parties can agree on what is consistently interpreted**

Ensure open communication between regulators and FBOs to help provide consistent approach and expectations. More risk or scientific analysis with clear links to the legal requirements and legislative context. More help to support a business facing an incident with advice.

##### **Information portal for incidents to be created with notification/alert systems**

Create an online repository for guidance with industry input to get more ownership and address vague areas, inconsistencies in the regulations or guidance, including terminology.

Customised notification portal using email and text alerts, which is mandatory for FBOs to be part of, with links to guidance and accessible to all.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

Mandatory incident reporting to capture all the required information to facilitate an investigation, a dedicated case officer who has access to all the necessary information and can make decisions.

### **A4 – Food business operator ensuring business will pass an unannounced inspection**

*Raised one time at Birmingham workshop.*

#### **Scenarios**

FBO needs to ensure the business passes the unannounced inspection so they can continue trading successfully.

#### **Pain points identified**

Regulation is complex and unclear.

There is a high audit burden for stakeholders who have different perspectives.

The high cost impact through the process and potentially beyond the initial inspection.

#### **Potential solutions**

##### **Improved guidance**

One place/one stop shop to find all regulation, guides, advice, good practice and standards, which is clearly signposted with regulation requirements. Platform design (web based) with intuitive design and searchable.

Carefully defined scope and case studies to demonstrate how regulation applies to different situations.

A single training programme for all those involved in assessing compliance and available for FBOs. Carry out real world user testing.

Guidance written by experts in accessible information using plain English and include 'how to' guides.

A phased approach to the guidance to cover the current status and then how to deliver improvements.

##### **Combined audits with regulators**

Combined audit between regulators with additional voluntary modules.

Shared audit information to inform a risk-based assessment based on a single agreed standard that goes back to basics.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **A5 – Food business operator looking to reduce their costs while still maintaining safe food production**

*Raised one time at Edinburgh workshop.*

#### **Scenarios**

An FBO run as a family business needs to strip out unnecessary costs in order to maximise profits while maintaining safety.

#### **Pain points identified**

Unfair or uneven application of the regulations.

Cost and money involved in ensuring compliance with regulations.

Lack of awareness or understanding of the requirements, which leads to increased costs.

#### **Potential solutions**

##### **Improving guidance**

Easy access to definitive guidance in the way the FBO wishes it (i.e. hard copy, online, DVD, such as FSS's CookSafe manual). Use plain English only.

Make a digital access point or platform for all the information and ensure it is always up to date. Make it customised for specific business types and incentivise the use of additional training materials and knowledge tests that will result in reduced audits or visits.

Make the guidance more product/process specific and include case studies and examples, including graphics and diagrams that help and templates where possible. Online training would also be helpful.

Regular face to face forums/working groups to discuss and share guidance and knowledge with peers (i.e. mentoring).

Carry out a reassessment of the ratio between enforcement and providing advice.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **B1 – Environmental Health Officer seeking to improve how interventions are carried out by the local authority**

*Raised one time at York workshop.*

#### **Scenarios**

An experienced EHO working in a unitary authority is aiming to improve how interventions operate in his LA.

#### **Pain points identified**

Businesses can change their named owner without having to inform the LA as part of their registration.

There are not enough resources especially in demanding situations.

FBOs can be confrontational.

#### **Potential solutions**

##### **FBO to have a named individual as the licenced owner**

The licence would be self-funding through charging. It would allow regulators to know who to enforce.

Licenced FBO data would be accurate and more helpful and unregistered FBOs could be removed from the chain, reducing possible fraud. Historical data on FBOs easier to find, especially in cases of FBOs using different company names or premises.

##### **One body for overseeing delivery of official controls**

Better sharing of data and resources with long term cost savings. Less duplication of work and more consistency. Better use of technology and intelligence sharing with other regulators. Provide better conflict resolution training.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **B2 – Environmental Health Officer helping an Food Business Operator to transition from LA registration to FSA approval**

*Raised one time at Wales workshop.*

#### **Scenarios**

Experienced EHO working for a unitary authority dealing with hygiene and standards and assisting an FBO through the process of moving from LA registration to FSA approval.

#### **Pain points identified**

Problems of different interpretations.

Differences between LA and FSA work process and applicable regulations.

Lack of exchange of information between the LA and FSA.

#### **Potential solutions**

##### **One agency to do all enforcement of hygiene and standards**

All enforcement officers in slaughterhouse/cutting/cold stores to join LA who would lead on legislative changes and consultations.

Benefits would include better incident management, greater consistency, business confidence in enforcers and independently audited by FSA/FSS.

##### **Joint training for all parties**

Extend LA consistency training to FSA/FSS and FBOs.

Consistent inspection and audits, increased business and consumer confidence and transparency between organisations.

##### **Extend Food Hygiene Rating System in Wales to other countries**

Follow implementation from Wales to provide a consistent approach for all.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **C1 – Official vets carrying out unannounced inspections**

*Raised two times at Edinburgh and Belfast workshops.*

#### **Scenarios**

Ensuring that the OV is able to conduct UAIs and assess compliance with regulations so that safe food production can be verified.

#### **Pain points identified**

Serious findings detected during the inspection.

Lack of open communication and understanding.

Challenge from FBOs or line managers regarding assessment of serious findings.

Not feeling adequately trained, under time pressure and unsure where to find necessary information.

#### **Potential solutions**

##### **Provide enhanced training package**

Review OV course length and content in light of current and future risks, and consider developing a sandwich course approach to learn application of theory in a phased manner with accompanied visits or shadowing.

Develop an appropriate training package from specialist providers, which includes resilience, conflict management, behavioural skills and resolution training, as well as lead auditor and HACCP training.

Enhanced support package for authorised officers with clearer guidance on actions to take, access to tools to deal with situations, relevant legislation, formal notices and where to get immediate support.

##### **Establish competency standard**

Articulate the 'as is' situation and conduct a gap analysis. Map all establishment and rank on compliance and complexity and profile competency against establishment compliance.

Apply existing model used for FBO audit and clarify the background, the actions which will follow if serious findings are detected and provide hard copies of audits.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### **C2 - Official Veterinarians carrying out approvals work**

*Raised one time at Edinburgh workshop.*

#### **Scenarios**

Approvals officer needing to verify an establishment's food safety management system is fit for purpose.

#### **Pain points identified**

Further research required in new/emerging technologies and associated hazards.

Incomplete original application for approval and associated documentation.

Lack of FBO cooperation in implementing agreed controls.

#### **Potential solutions**

##### **Improved training**

Encourage a training culture amongst officers and incentivise additional training.

Identify and design the required and appropriate training to suit the officers' needs and ensure it is accredited and delivered via an approved training and assessment centre.

Build training into work schedule and make it a contractual requirement to ensure appropriate cover during absence.

##### **Create and use a specialist officer network with expert guidance**

Make this network centrally resourced and coordinated with appropriate governance and operational structures (Board, validation panel etc.)

Obtain buy-in from stakeholders, communicate and promote its existence, and ensure continued professional development.

Provide training for access and use of a network, ensure horizon scanning for advances and new technologies.

## WORKSHOP OUTPUTS PRODUCED BY ATTENDEES

### Other review feedback

In addition to the group work undertaken, attendees were also invited to raise any other matters and ideas for consideration in the review. A selection of these are shown below.

- One set of consolidated guidance, including traceability and labelling
- Organise training courses including businesses
- Too many demands for information
- Use by date inconsistency from suppliers
- Can OVs be assigned to an FBO for three years?
- Must involve LAs and industry in development of policy from outset
- Common sense applied to plant inspection (a label missing off a batch surely should not mean it is unfit and condemned)
- FSA 2017 Vac Pack/MAP guidance needs to be suspended prior to review of risk/science regarding fresh meat
- Not all meat operations are monitored and two tonne limit can be abused
- Align 3rd party audits (e.g. BRC) with formal FSS/FSA audit
- Are the approval deadlines suitable? Do they allow enough time to make an informed recommendation (by officers)?
- Difference in terminology between FSA delivery, which distinguishes between audit and inspection activity, and LA delivery which captures it all in a single term – intervention
- Export certification as an area of potentially high risk given differing approaches adopted by LAs and central competent authority
- Concerns around FBO frequent changes of ownership
- Use of primary authorities to deliver more aligned official controls.

**These pages contain summarised feedback produced by the workshop attendees and were not produced by the FSA or FSS.**