

Strategic Indicator

# Animal Welfare

Indicator Outcome Number

4.5.6

Indicator Measure

The number of category 3 & 4 welfare incidents recorded at the farm, in transport and at meat plants.

What is the role of FSS?

One of the key functions of Food Standards Scotland (FSS) is to ensure that animals are protected by FBOs prior to and during slaughter and killing.

On behalf of SG, FSS enforces legislation that ensures only licensed, trained and competent operatives are involved in slaughter, killing and related operations.

FSS also plays an important role in relation to assisting the Animal and Plant Health Agency (APHA) and Local Authorities with animal welfare on farm and during transport under a Service Level Agreement (SLA) with SG.

Where sufficient evidence is available, enforcement action is taken against any non-compliant business in relation to animal welfare. This is reflected in audit reports and the audit frequency will increase for non-compliant premises.

Why is this Strategic Indicator Important?

- It provides an overall view of welfare levels at slaughter
- It shows origin of welfare issues
- It allows FSS to detect negative trends and act, advising relevant organisations of emerging risk
- An area of interest for public and media, leading to queries/FOI requests.
- A possibility of reputational risk to FSS

Severity of Welfare Incidents

Category 3

Technical breach of the Regulations but there was **no evidence** of any avoidable pain, distress or suffering to the animal during their killing and related operations.

Category 4

Breach of welfare Regulations with **evidence of** avoidable pain, distress or suffering to the animal during their killing and related operations, or a contravention poses a serious and imminent risk to animal welfare.

FSS Performance update – (refer to graphs – overview)

FSS is continuing to improve the monitoring and reporting system for animal welfare breaches. Initiatives in 2016 raised the profile of animal welfare resulting in an increased level of reporting. FSS engaged in discussions and collaboration with the enforcement authorities competent for farm and/or transport (APHA and LAs) to improve monitoring and action on animal welfare non-compliances. FSS is collaborating with the Animal Health and Welfare Strategy Group and LA local panels to address non-compliances spanning multiple agencies. The Scottish Livestock Welfare Group (SLWG) was created to review welfare data and intelligence, address areas for improvement in a coordinated approach and review welfare policy to secure improvements in welfare.

Animal welfare breaches that occur within approved slaughterhouses in Scotland are investigated and proportionate action is taken by official veterinary personnel. The action will range from verbal advice, enforcement letters, welfare enforcement notices to investigations with a view to providing reports to the Procurator Fiscal, and if required the suspension or revocation of slaughterer's Certificate of Competence.

FSS Influence on performance markers

- FSS has enforcement power/tools to stop/change/influence processes to ensure animal welfare at slaughter is protected.
- FSS report all issues to competent authorities (APHA/LA), providing the required information and evidence to improve welfare on farm and during transport.
- FSS collaborate with APHA and LAs to improve the overall welfare of animals in Scotland.

Issues within reporting Period (01/10/2018 -31/03/2019)

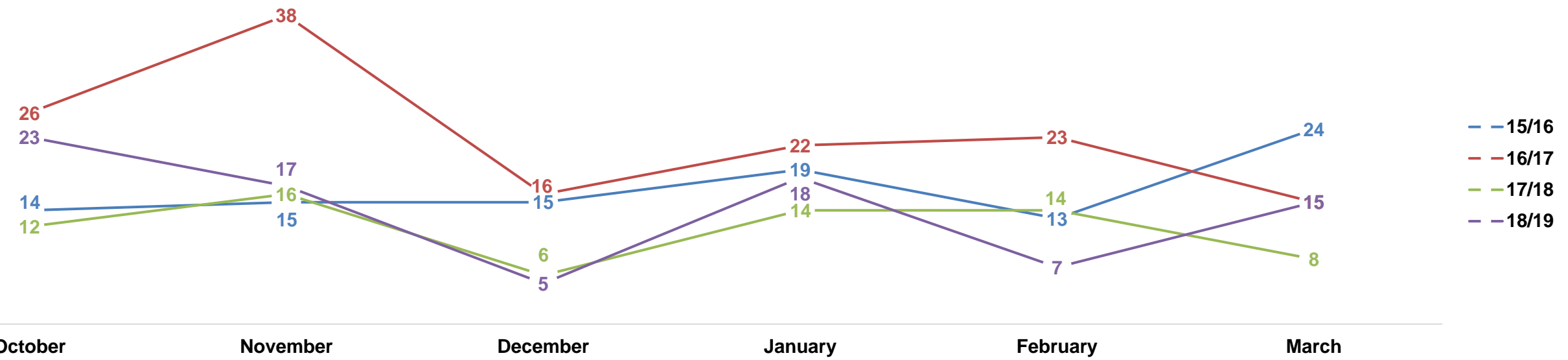
Quarter 3 and 4 saw an overall increase in Score 4 Welfare incidents in December 2018 and February 2019 of the reporting period in comparison to the previous year's however October, November, January and March all experienced a downward trend in comparison to previous years. The incidents were mainly related to farm and transport incidents. Overall, there were a total of 194 incidents which include both scores 3 and 4 with 50 (25%) related to abattoirs and 144 (75%) related to farm and transport. Of these, 27 score 3 incidents (14%) and 23 score 4 incidents (12%) were attributed to abattoirs and the remainder of 58 score 3 incidents (30%) and 86 score 4 incidents (44%) were attributed to farm and transport.

All abattoir incidents were addressed by the appropriate enforcement action where applicable and all farm and transport related incidents were reported to the relevant enforcement authority.

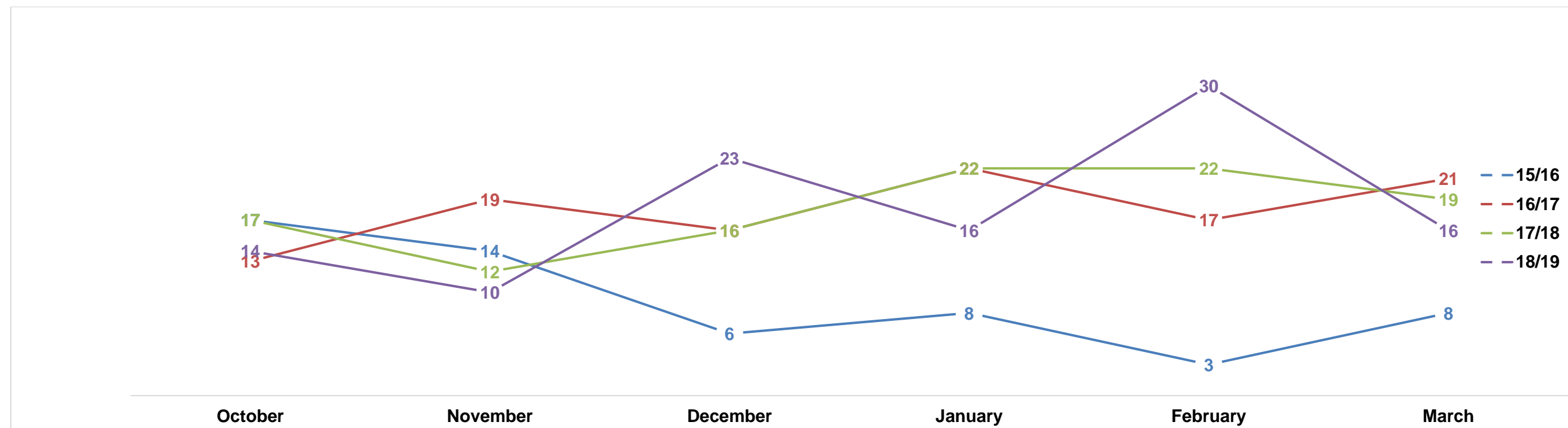
Scottish Trends

Graphs overleaf show welfare incident trends

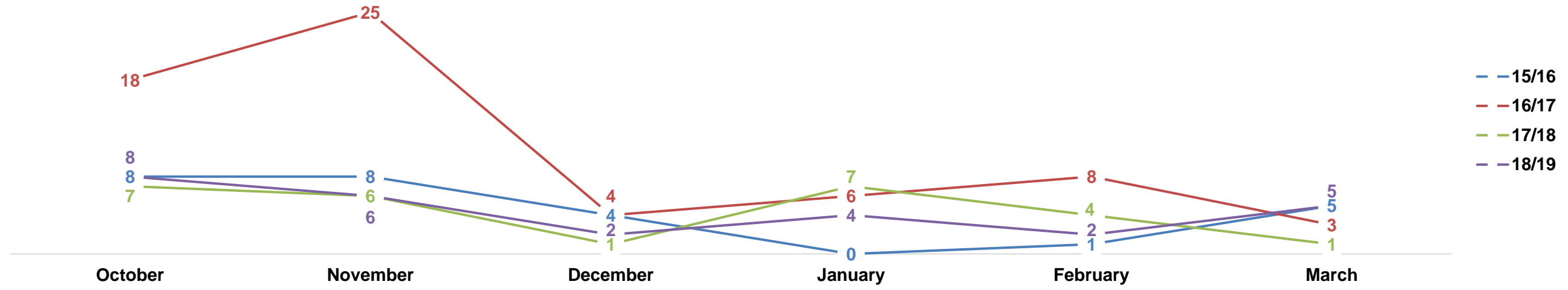
**NON COMPLIANCE SUMMARY SCORE 3**



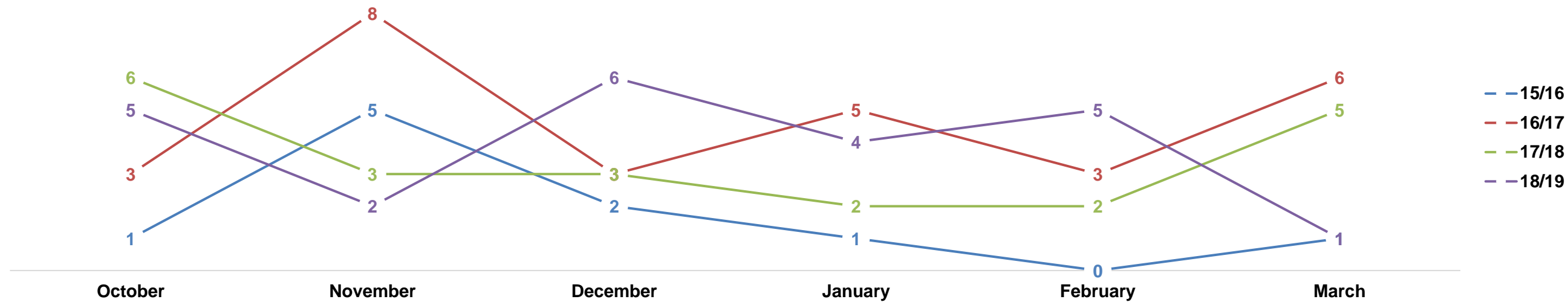
**NON COMPLIANCE SUMMARY SCORE 4**



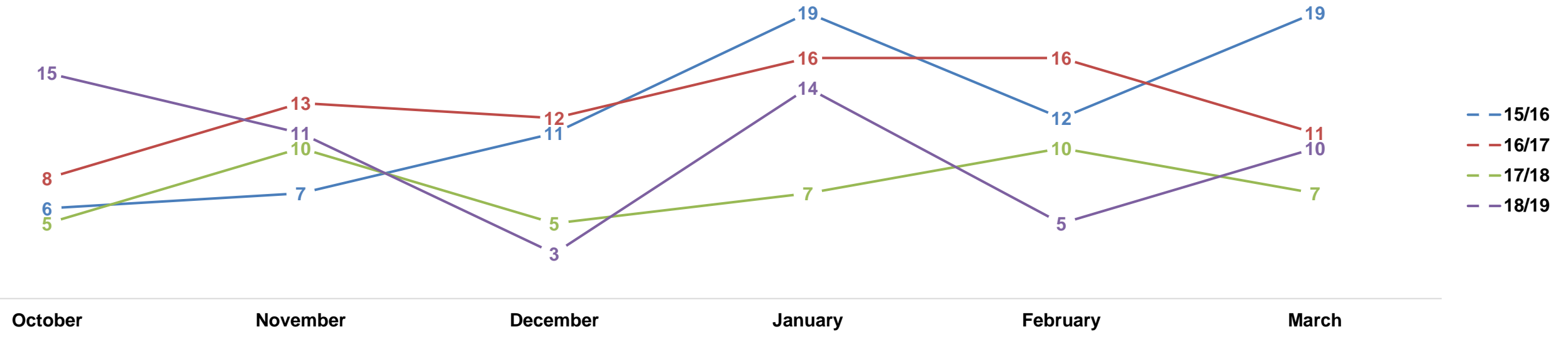
**WELFARE BREACHES IN ABATTOIRS – SCORE 3**



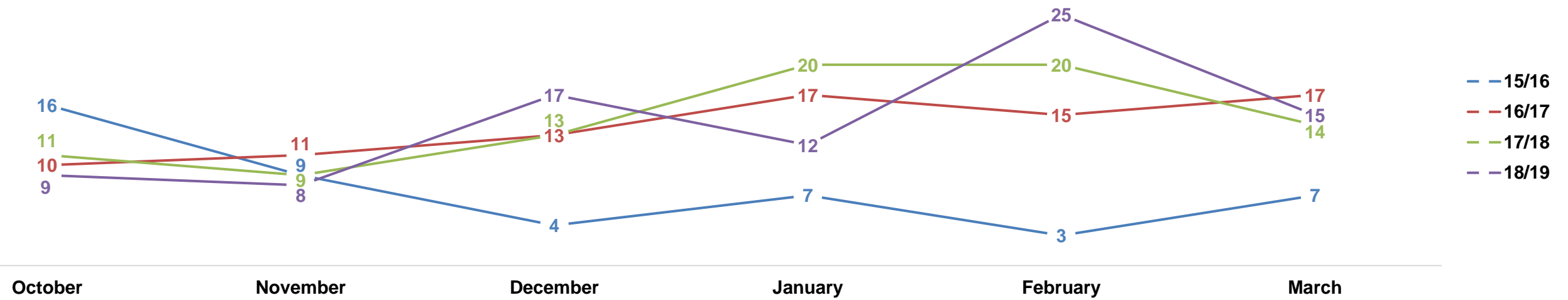
**WELFARE BREACHES IN ABATTOIRS – SCORE 4**



**WELFARE BREACHES ON FARM OR TRANSPORT - SCORE 3**



**WELFARE BREACHES ON FARM OR TRANSPORT - SCORE 4**



Strategic Indicator

# Visible Contamination

Indicator Outcome  
Number

1,5,6

Indicator Measure

Number of contaminated carcasses presented to FSS staff for inspection

What is the role of FSS?

FSS engages with FBOs to secure reducing levels of contamination. FSS inspectors record every instance where a contaminated carcass is presented for inspection and this is a proxy measure for hygienic production.

FSS ensures that all carcasses (red meat) where a health mark is applied are free from visible contamination and fit for human consumption. If contaminated carcasses are presented for inspection then we do not apply a health mark. The food business operator (FBO) must rectify the problem and re-submit for final inspection and only once it is free of visible contamination will it be health marked

FSS Official Veterinarians re-inspect a pre-set quantity of carcasses and offal to provide assurance on the effectiveness of inspection.

Why is this Strategic Indicator Important?

It is the responsibility of the FBO in slaughterhouses to present carcasses and offal to the FSS for final inspection free from contamination by faeces, gut content, hair, wool, bile, etc. in accordance with the FBO's procedures based on HACCP principles

- To protect public Health
- To ensure meat is fit for human consumption
- To provide an overview of dressing practices of premises in Scotland which can help to monitor possible emerging risks

FSS Influence on performance markers

FSS exercises enforcement powers to stop/alter unhygienic dressing practices and engages with FBOs to promote best practice. Real time monitoring allows for timely corrective actions at plant level and analysis of trends and comparative plant data allows for detection of possible emerging risks

FSS Performance update

Contaminated carcasses presented for inspection remain below the levels set as an internal target with FBOs.

Contamination in all three species are tracking at the lowest levels ever recorded as we see more FBOs taking action at the root cause, implementing HACCP principles at an earlier stage in the process.

Carcass contamination across all 3 species was stable during the Q3 & Q4 periods, with all 3 species tracking below our internal targets for carcasses presented for inspection. We are fully supportive of our SDP partner to robustly enforce HACCP principles for Monitoring and corrective action plans as well as training of plant staff.

Contamination Graphs

Each red meat species has a contamination level for carcasses presented for inspection below which we expect all plants to operate whilst recognising no contamination is acceptable.

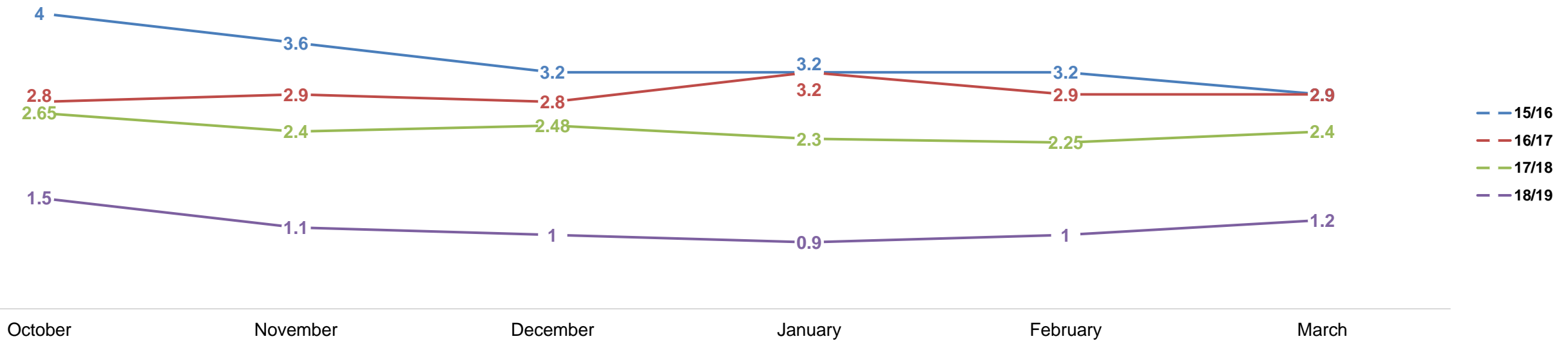
- Cattle – 4%
- Sheep – 4%
- Pigs – 2%

Each graph shows the total percentage for each month by species.

CONTAMINATION MONTHLY AVERAGES, ALL SCOTLAND

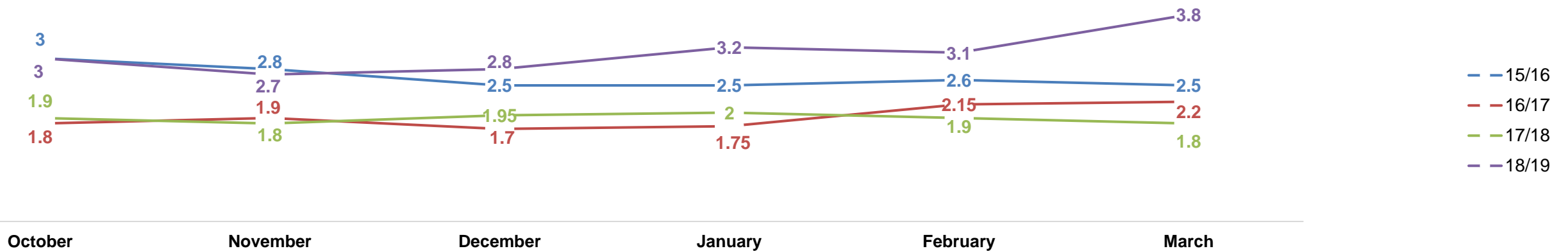
Scottish Trends

BOVINE CONTAMINATION %



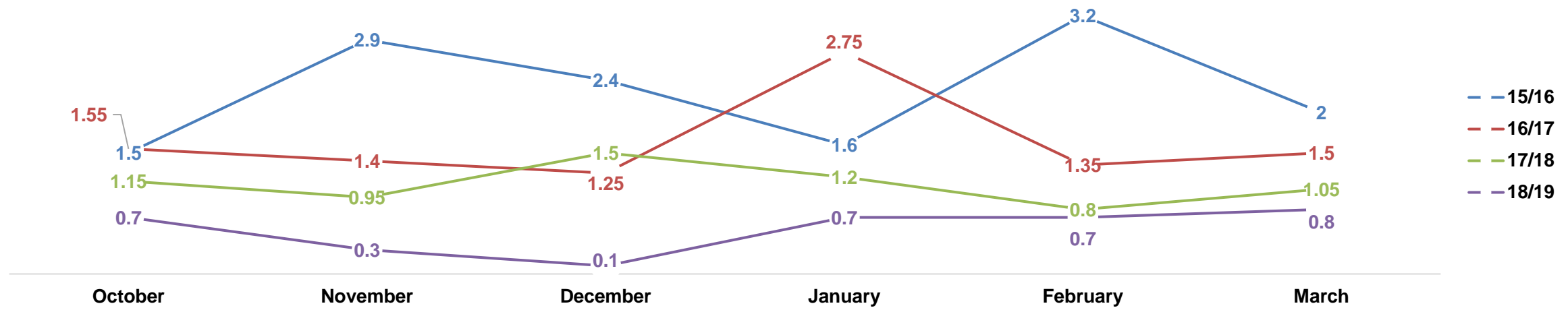
In Q3 & Q4 contamination in cattle has consistently shown a downward trend and are at the lowest level in the last 4 years, spikes are continuing to be robustly enforced by the OV when they occur. MHIs are now routinely securing evidence at final inspection points to assist OV's in taking risk based proportionate action when required. FBOs are becoming more proactive rather than reactive taking action at the root cause.

OVINE CONTAMINATION %



Risk based proportionate enforcement action is being applied by the OV when spikes in contamination occur. MHI plant teams are continuing to robustly record and gather evidence on contamination at final inspection providing the OV with the necessary data to enforce HACCP principals on training, monitoring and corrective actions when required. FBOs are encouraged to monitor the root cause of contamination and ensure corrective actions are in place if necessary

### PORCINE CONTAMINATION %



Q3 & Q4 Pig contamination is tracking at the lowest levels ever recorded well below the 2% Scottish average. OV's are applying risk based proportionate enforcement action when there are any spikes highlighted by the FSS plant teams. MHIs are continuing to collate evidence at final inspection to inform the OV of increases at an early stage. FBOs are now more proactive in taking action at the root cause.

Strategic Indicator

**Veterinary Audit**

Indicator Outcome Number

1,4,5,6

Indicator Measures

The number of approved meat premises with 'good' or 'generally satisfactory' audit outcomes and the number of approved meat premises with 'improvement necessary' or 'urgent improvement necessary'.

What is the role of FSS?

The audit frequency is determined by the categorisation of any non-compliance identified and in the level of permanent supervision within the plant by FSS staff.

Audits and follow-up audits are carried out on an announced basis, with unannounced inspections also taking place in between scheduled inspections in cutting plants.

FSS has a dedicated in-house team of trained veterinary auditors carrying out these audits in Scotland.

Why is this Strategic Indicator Important?

These audits have two main aims:

- To make sure that food business operators are complying with food law requirements
- To ensure that food business operators are meeting relevant standards in relation to public health and, in slaughterhouses, animal health and welfare.

Audit Categories and Frequency

Good	No majors or critical on day of audit or during audit period – 12/18 months
Generally Satisfactory	No more than 2 majors during audit or during audit period rectified promptly. No critical during audit period – 12 months
Improvement Necessary	3-6 majors during audit or during audit period. No critical during audit period – 3 months
Urgent Improvement Necessary	1 critical or >6 majors during audit or during audit period – 2 months

FSS Performance update

From 1<sup>st</sup> October 2018 to the end of March 2019, 9 plants received an Improvement Necessary Audit Outcome, no plants received an Urgent Improvement Necessary outcome during this period.

In the same period, 1<sup>st</sup> October 2018 to the end of March 2019, there have been a total of 77 major non compliances identified and no critical non compliances in 50 audits carried out.

Major non compliances include the following: monitoring procedures for critical control points hygienic production - all handling and processes from slaughtering to dispatch should be done in a way that avoids the contamination of meat and offal entering the food chain, staff training/instruction and supervision, processing compliance - controls ensure that the risk of cross contamination is minimised, prevented or reduced to acceptable levels during operation and appropriate action taken should contamination occur.

FSS Influence on performance markers

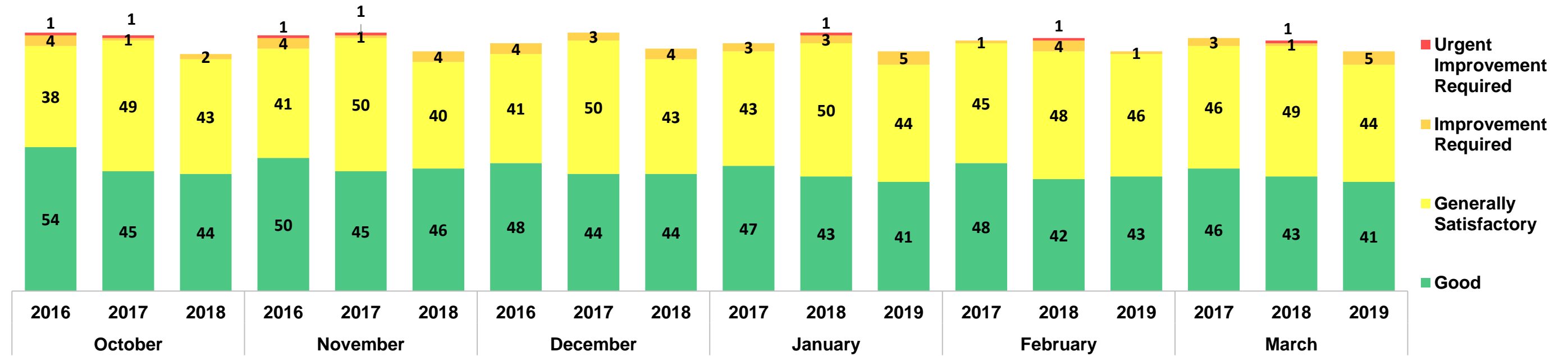
Take appropriate enforcement action when non-compliance is observed.

Scottish Trends

Graph overleaf showing veterinary audit outcome trends



### VETERINARY AUDIT OUTCOME TRENDS



#### Improvement Necessary Plants (at 31<sup>st</sup> March 2019)

Plant Number	Name
1163	Smiths Direct Butchers Ltd
1208	Rehmat Poultry Ltd
1508	Michael Malone of Edinburgh
1598	Dunbia (UK) (t/a Dunbia Highland Meats)
1740	John Henderson (Meat Specialists) Ltd

#### Urgent Improvement Necessary Plants (at 31<sup>st</sup> March 2019)

Plant Number	Name
n/a	

Strategic Indicator

# Local Authority Audit

Indicator Outcome Number

1

Audit Assurance Categories

<b>Substantial Assurance</b> <i>Controls are robust and well managed</i>	Risk, governance and control procedures are effective in supporting the delivery of any related objectives. Any exposure to potential weakness is low and the materiality of any consequent risk is negligible.
<b>Reasonable Assurance</b> <i>Controls are adequate but require improvement</i>	Some improvements are required to enhance the adequacy and effectiveness of procedures. There are weaknesses in the risk, governance and/or control procedures in place but not of a significant nature.
<b>Limited Assurance</b> <i>Controls are developing but weak</i>	There are weaknesses in the current risk, governance and/or control procedures that either do, or could, affect the delivery of any related objectives. Exposure to the weaknesses identified is moderate and being mitigated.
<b>Insufficient Assurance</b> <i>Controls are not acceptable and have notable weaknesses</i>	There are significant weaknesses in the current risk, governance and/or control procedures, to the extent that the delivery of objectives is at risk. Exposure to the weaknesses identified is sizeable and requires urgent mitigating action.

What is FSS' Role?

The power to set standards, monitor and audit the performance of enforcement authorities was conferred on Food Standards Scotland by Sections 3 and 25 of the Food (Scotland) Act 2015 and Regulation 7 of The Official Feed and Food Controls (Scotland) Regulations 2009.

As a designated competent authority as defined within Schedule 5 of the Official Feed and Food Control (Scotland) Regulations 2009 Local Authorities are required to comply with Article 4(6) of Regulation (EC) No 882/2004 (*in that they shall carry out internal audits or may have external audits carried out, and shall take appropriate measures in the light of their results, to ensure that they are achieving the objectives of this regulation*). In order to help Local Authorities fulfil this requirement, (as part of its central role under the Food (Scotland) Act 2015 and Official Feed and Food Control (Scotland) Regulations 2009) Food Standards Scotland deliver external audit arrangements in addition to the monitoring role described above.

Why is this Strategic Indicator Important?

Food Standards Scotland has a key role in overseeing delivery of feed and food law (any form of control that is performed for the verification of compliance with feed and food law).

Food Standards Scotland seeks to work in partnership with Local Authorities and others to help them to enforce feed and food law and is therefore pro-active in setting and monitoring standards, and auditing delivery of feed and food law and ensuring that this activity complies with the Scottish Regulators' Strategic Code of Practice.

Current Audit Programme - Capacity and Capability

The specific aims of this audit programme are to:

- Evaluate the organisational, management and information systems in place to ensure they are effective and suitable to achieve the objectives of the relevant food law.
- Assess the capacity and capability of the Local Authority to deliver the food service.
- Provide a means to identify under performance in Local Authority food law enforcement systems.
- Assist in the identification and dissemination of good practice to aid consistency.
- Provide information to aid the formulation of Food Standards Scotland policy.

Completed Audits (1<sup>st</sup> October 2018- 31<sup>st</sup> March 2019)

Local Authority	Audit Scope	Audit Date	Audit Outcome
Highland Council	Capacity and Capability	30/10/2018 - 01/11/2018 03/12/2018 - 02/12/2018 & 11/12/2019	Insufficient Assurance

Strategic Indicator

# Shellfish Monitoring Programme

Indicator Outcome Number

1,5,6

Indicator Measure

The number of samples exceeding the maximum permitted levels resulting in the closure of shellfish production areas.

What is the role of FSS?

As the Competent Authority for food safety, FSS delivers official controls to determine the safety of marine waters used for the harvesting of live bivalve molluscs in Scotland, as described in EC Regulations. FSS is responsible for ensuring that shellfish from designated harvesting areas meet the health standards laid down in EC Regulation 853/2004, testing for E.coli, Biotoxins, Phytoplankton and Chemical Contaminants. Shellfish classifications are awarded based on the levels of E. coli in shellfish flesh. See Shellfish classification categories and permitted levels of E. coli are shown below.

Why is this Strategic Indicator Important?

- To ensure that FSS carries out its responsibility in effectively managing the shellfish monitoring programmes, a Memorandum of Understanding (MOU), Service Level Agreements (SLAs) and contracts which ensures compliance with relevant food safety regulations
- To ensure that all sampling requirements are met and shellfish from designated harvesting areas meet the health standards stipulated in EU Regulations.

Shellfish classification categories and permitted levels of E. coli/100g flesh:

Treatment processes are specified according to the classification status of the area.

Category	Classification criteria	Action
A	80 % of samples collected during the review period ≤ 230 E. coli/100 g of flesh and intravalvular liquid. The remaining 20% of samples ≤ 700 E. coli/100 g of flesh and intravalvular liquid.	May go directly for human consumption if end product standard met
B	90 % of samples collected during review period ≤ 4 600E. Coli/100 g of flesh and intravalvular liquid. The remaining 10% of samples ≤ 46 000 E. Coli/100 g of flesh and intravalvular liquid.	Must be subject to purification, relaying in Class A area (to meet category A requirements) or cooked by an approved method.
C	Samples ≤ 46,000 E coli/100g of flesh and intravalvular liquid	Must be subject to relaying for a period of at least 2 months or cooked by an approved method
	Any value exceeding 46,000 E coli /100g of flesh and intravalvular liquid	Prohibited. Harvesting not permitted

FSS Influence on performance markers

- Effective management of the MoU and contracts to ensure compliance

From April 2017, a revised risk assessment was implemented for the biotoxin monitoring programme. This resulted in a significant reduction on the number of tests that were carried out throughout the year.

**During 2017/18**, of the 1870 tested for lipophilic toxins (LTs), 17 inshore samples breached the maximum permitted levels.

Analyses for amnesic shellfish poisoning (ASP) toxins, analysed by an HPLC method, were conducted on 909 samples from inshore locations with no samples breaching the maximum permitted levels.

A total of 1300 samples from inshore locations were tested for paralytic shellfish poisoning (PSP) toxins. Five inshore samples breached maximum permitted levels for PSP.

**This resulted in a total of 17 LT closures and 5 PSP closures during 2017/18.** During 2017/18, a marked reduction in closures was observed which was inconsistent with previous years.

**In 2018/19**, there was a significant increase in closures, in line with trends observed prior to 2017.

Of the 1875 tested, 255 inshore samples breached maximum permitted levels for LTs.

Analyses for ASP toxins were conducted on 812 samples with no samples breaching the maximum permitted levels.

A total of 1177 samples from inshore locations were tested for PSP toxins. Nine inshore samples breached maximum permitted levels for PSP.

**This resulted in a total of 44 LT closures and 9 PSP closures 2018/19.**

Maximum Permitted Limits of toxins in shellfish flesh

Toxin group	Maximum Permitted Limits
ASP	>20 mg Domoic/epi-domoic acid/kg [shellfish flesh]
LTs	Diarrhetic shellfish poisoning (DSP) toxins and pectenotoxins (PTXs) together, >160µg okadaic acid eq./kg [shellfish flesh] or Yessotoxins, >3.75mg yessotoxin eq./kg [shellfish flesh] or Azaspiracids, >160µg azaspiracid eq./kg [shellfish flesh]
PSP	>800µg saxitoxin eq./kg [shellfish flesh]

