Introduction

1. The Food Standards Agency (FSA) is a non-Ministerial Government Department and Regulator, established by the Food Standards Act 1999 to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food.

2. We work to make sure food is safe, that it is what it says it is, and that people are not exposed to unacceptable risk. We seek to achieve this through our role as UK central competent authority for food and animal feed, with a permanent regulatory presence in abattoirs and cutting plants, and overseeing the work of local authorities in England and Wales. In Scotland, this role is carried out by Food Standards Scotland (FSS), and in Northern Ireland by the FSA working with the Department of Agriculture, Environment and Rural Affairs.

3. The food sector in the UK and globally is heavily regulated to provide protection to public health, which is a prerequisite to maintaining public trust in food as well as supporting UK food exports and global food trade. The damage caused if public trust (whether at home or abroad) in food is put at risk or undermined is severe – with substantial consequences for public health and the environment, as well as major economic consequences for the Exchequer and for businesses.

4. Approximately 95% of UK food and feed law originates from the EU and the UK relies on a number of EU institutions and operational systems designed to protect the integrity and safety of the food system. Exiting the EU therefore presents a range of potential impacts for food safety and hygiene policy, public health and consumer confidence. The FSA is working closely with other Government Departments to ensure consumer protection and consumers other interests remain safeguarded and the UK regulatory framework and official control system remains effective and sustainable.

Official controls in FSA approved meat establishments

5. EU food hygiene regulations require certain official controls in approved meat establishments to be carried out only by an Official Veterinarian (OV), and some controls that may also be carried out by qualified official auxiliaries working under the authority and responsibility of an official veterinarian. Official auxiliary functions in the UK are performed by Meat Hygiene Inspectors (MHI).

6. The role of OVs in slaughterhouses includes verification that operators are fulfilling their responsibilities with regard to animal health, public health and animal welfare (such as undertaking ante-mortem inspection and supervising post-mortem inspection - both key controls of zoonotic disease and animal welfare) as well as protection of the environment. OVs also fulfil a vital role in facilitating trade, helping maintain public trust and commercial confidence in food production and avoidance of disease outbreaks as well as issuing Export Health Certificates necessary to export products of animal origin.
7. Whilst regulatory arrangements are likely to adjust once the UK leaves the EU, the FSA’s current judgment is that veterinary and meat inspection competencies will remain an essential part of our future food safety and standards regime.

8. The FSA is working closely with the Department for Environment, Food and Rural Affairs (Defra), the Animal and Plant Health Agency (APHA) and the Royal College of Veterinary Surgeons (RCVS) and the British Veterinary Association (BVA) to map the scale of the UK government reliance on the public sector veterinary workforce and to co-ordinate our approach in monitoring and maintaining UK capability in this area.

**FSA reliance on workforces from other EU Member States**

9. The OV role performed in UK slaughterhouses is not generally considered attractive to UK citizens qualified as veterinarians, and more lucrative prospects are available in the private sector. The profession relies on a flexible, highly mobile workforce from the EU and as such sees a relatively high turnover of staff.

10. FSA financial and employment data has identified that **greater than 95% of FSA employed veterinarians and contracted OVs combined originate from other EU (non-UK) countries.**

<table>
<thead>
<tr>
<th>Number of government veterinarians and official veterinarians (OVs)</th>
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<td>The FSA currently employs approximately 50 government veterinarians across England and Wales to undertake certain official control functions - such as approval and audit of FSA approved meat establishments – to provide general veterinary advice and other related functions. This is a fairly static figure with only minimal variance expected from year to year. Of these 85% are non-UK EU staff.</td>
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<td>The FSA also contracts OVs to carry out routine official controls - such as ante-mortem inspection and mandatory supervision requirements – carried out daily in FSA approved meat establishments in England and Wales. The number of OVs contracted by the FSA is based on the needs identified by individual FSA approved meat establishments and therefore the number of OVs is variable from month to month. Latest FSA data shows that approximately 280 OVs are currently contracted by the FSA of which 97% are non-UK EU staff. The total number of OVs is approximately 330 of which 95% are EU nationals from outside the UK.</td>
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11. The majority of MHIs employed directly by the FSA are UK nationals, however this figure is based on a legacy workforce of UK citizens, whereas current recruitment of new MHIs is almost entirely reliant on EU nationals.

12. Recruitment of the legacy MHI workforce is understood to have been primarily undertaken from within the meat industry (i.e. incentivising existing slaughterhouse operatives). Reliance on this model after the UK exits the EU would likely face competing demand with industry, which also currently has a high reliance on EU workforces.

13. Following the EU Referendum an effort has been made by the FSA's contractor to attract more UK MHI staff which has caused the total share of EU MHI staff to fall from 92% during 2017 Q1 to 81% during 2017 Q3. The percentage of OVs that are from the EU has remained at 97%. There is no data to support whether this trend will continue in future.
Number of meat hygiene inspectors (MHIs)

The number of MHIs operating in FSA approved meat establishments is also subject to the need identified by FSA approved meat establishments. Latest FSA data (up to 2017 Q3) shows that the FSA currently employs approximately 480 MHIs, of which 2% are non-UK EU staff, and contracts approximately 230 MHIs, of which 81% are EU staff. The total number of MHIs is approximately 700 of which 27% are EU nationals from outside the UK.

The current employment model operated by FSA contractors relies on certain staff (approx. 250 p.a.) to perform dual roles on an ad-hoc basis to supplement to maintain efficiency. The data provided above is based on actual head count without double counting those that have the performed dual roles.

The above figures also exclude Poultry Inspector Assistants (PIAs), which poultry plants are permitted to employ directly to assist the OV to reduce their resource requirement for MHIs. There are approximately 50 (FTE) PIAs employed by industry.

Scotland and Northern Ireland OV and MHI workforce

14. Food Standards Scotland (FSS) is responsible for the OV and MHI workforce that carries out official controls in FSS approved meat establishments in Scotland. Their reliance on EU workforces from outside the UK is broadly similar to that in England and Wales but on a far smaller scale. The Department of Agriculture, Environment and Rural Affairs is responsible for the OV and MHI, workforce that carry out official controls in FSA approved meat establishments in Northern Ireland. The situation in Northern Ireland is very different to the rest of the UK because of the land border with the Republic of Ireland introducing greater complexity over the nationality of the workforce.

Training

15. Veterinary - Undergraduate veterinary training takes 5-6 years to complete and universities offering qualifications in the UK are routinely oversubscribed. Students at UK veterinary schools are overwhelmingly interested in small animal work, with only 6% of students expressing an interest in “government work” (Vet Futures survey of students and recent graduates, 2015)\(^1\). Veterinary public health skills – a necessary element of OV’s training, is also currently not adequately served by the working preferences of UK qualified vets.

16. Non-EU Veterinary qualifications are largely not recognised by the RCVS, with whom registration is required for all veterinary surgeons working in the UK. It is estimated that the training and exams needed for these vets to register with the RCVS take at least 2 years.

17. MHIs - Training for new MHIs is generally understood to take 6-9 months for those with experience of working in the sector. No specific qualifications are required in order to become an MHI. In practice, however, veterinary graduates from other EU member states are normally recruited to these posts (as veterinary qualifications have mutual recognition) allowing them to gain relevant skills and experience necessary to qualify as an OV or progress towards other future career choices in the UK.

Recruitment practice and cost implications for official controls in the meat sector

\(^1\) [http://www.vetfutures.org.uk/download/surveys-filebase/Voices%20from%20the%20future%20of%20the%20profession%20July%202015.pdf](http://www.vetfutures.org.uk/download/surveys-filebase/Voices%20from%20the%20future%20of%20the%20profession%20July%202015.pdf)
18. Proposals announced by the Government on 26 June, outlining how it intends to protect the rights of EU citizens in the UK and UK nationals in the EU, provides assurance to the current workforce that their right to stay and work in the UK will be protected after the UK leaves the EU. The FSA is therefore focused on ensuring retention of the current workforce and developing plans for maintaining this workforce after the UK exits the EU. The Government assurance is critical for this workforce as there is no reserve workforce that could be relied upon to fulfil the official controls is FSA approved meat establishments.

19. Since the EU referendum, the FSA’s current contractor of OVIs and MHIs has made an increasing effort to attract UK workers (e.g. by attending university career fairs). Due to this and increasing competition for EU vets, according to our contractor, compensation packages have risen by an estimated 10% during 2017.

20. Attracting UK citizens toward future veterinary careers focused on government work would require long term planning and, if achievable, would require significant financial and other incentives. University capacity for veterinary undergraduate placements would also need to be enhanced in order to meet the capacity for UK Government needs. Incentivising existing UK veterinarians to undertake official controls in FSA approved meat establishments would require a significant financial investment before salaries could begin to compete with those understood to be paid in other veterinary fields across the UK.

21. Training UK citizens to take up MHI profession could be achieved in a relatively short timeframe (comparatively) but the financial incentives necessary to attract a UK workforce are anticipated to be significant.

22. Official control charges (which are required in legislation) are currently shared 50/50 between the FSA and industry. Any reform of the system that changes the cost borne by industry would be highly controversial and politically sensitive. The ability of the meat industry to bear new costs will vary significantly between sectors and size of the businesses involved but it is likely that smaller businesses would be less resilient to such changes. Significant changes in the cost of official controls charges could also impact on the competitiveness of meat produced in the UK.

23. The FSA in partnership with the meat Industry have been introducing efficiency and other cost saving measures for a number of years. The FSA continues to work with industry to review the role of its meat hygiene workforce to enhance safety, efficiency and reduce costs.

Economic Value

24. According to Defra, the combined value of UK production of beef, pork, poultry, lamb, mutton and veal in 2016 was approximately £7.26bn\(^2\) and total UK exports for meat is valued at £1.6bn\(^3\).

\(^2\) Defra statistics (2016) ‘Agriculture in the United Kingdom ’

\(^3\) Defra Food Statistics Pocket Book 2016