



Department
for Environment
Food & Rural Affairs

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Farming Regulation Task Force Implementation

Earned Recognition Plan

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Introduction

In response to the Farming Regulation Task Force ('Task Force'), and the NAO report on Streamlining Farm Oversight, Government is working to reduce unnecessary regulatory compliance and enforcement burdens on farmers. To reduce these burdens we are:

- Increasing data sharing between Defra agencies;
- Promoting better co-ordination of on-farm inspections, and;
- Where possible, implementing opportunities to allow farmers to earn recognition.

This plan sets out what action we are taking to implement an earned recognition approach into on-farm inspection regimes. Further information on wider work taking place to reduce administrative burdens on farmers is also included in [Annex A](#).

Background

The Task Force was set up in July 2010 to carry out an independent review on ways of reducing regulatory burdens on farmers and food processors. The Task Force reported its findings to government in May 2011 making over 200 recommendations on how regulatory burdens could be reduced.

One of the key themes of the Task Force report was the need for government to adopt an 'earned recognition' approach to reduce the burden of inspections. The Task Force explained that this approach:

"...is about giving official recognition to the effective efforts made by individuals and businesses in understanding legal requirements and getting things right"¹.

In response to the Task Force report, government accepted the principle of earned recognition and committed to identifying opportunities for applying earned recognition to existing inspection regimes.

¹ The report of the Independent Farming Regulation Task Force. Striking a balance: reducing burdens; increasing responsibility; earning recognition. Pg. 20 (May 2011).

Earned Recognition

In the context of this work, earned recognition is finding ways to reduce the administrative burden² of regulation on those who have a strong track record of reliability and adherence to standards. It does not necessarily mean a reduction in the total number of on-farm inspections, but rather an opportunity to improve targeting of those inspections to where the risks of non-compliance are highest.

In considering earned recognition we must ensure that:

- Safety, animal welfare and the environment standards are protected.
- Where used, recognised third party inspections are demonstrably robust, independent and subject to robust checks and controls.
- Introducing earned recognition should be fair and proportionate, undertaken in consultation with interested parties.
- Regulators remain fully responsible for enforcement and sanctions.

Implementing an earned recognition approach into on-farm inspections

Earned recognition is already in place for a number of inspection regimes as detailed in [Annex B](#). To help improve the risk based targeting of inspections, we are committed to implementing an earned recognition factor, to play alongside other risk factors such as site location or activity, into a wider number of on-farm inspection risk models. To achieve this, in close working with our regulatory delivery partners, we have compiled a list of all on-farm inspections. For each inspection we have evaluated the potential for applying an earned recognition approach. Potential was assessed against two key criteria which included:

- Potential for a risk based approach be applied to the selection of premises to visit.
- The level of burden imposed by the inspection regime (this work does not include looking at the burden of non-government inspections, for example, those inspections carried out by assurance schemes).

² Administrative burden defined by the Hampton Review (2005) as “the cost in time or money of regulators’ inspection and enforcement activities (form filling etc.)”

No scope was found for applying an earned recognition approach in inspections where:

- EU legislation prevents us from taking earned recognition forward. Where this is the case we will bear the principles of earned recognition in mind during future EU negotiations.
- The inspection activity can be classed as ‘surveillance’ or is an inspection following up a complaint or suspicion that the law is being broken.
- The burden of the inspections is minimal; therefore taking an earned recognition approach would have little impact on farmers’ lives e.g. Animal Gatherings, Medicated Feed or GM inspections.

More detailed information on inspection regimes can be found in [Annex C](#).

This assessment covers inspections made by:

- Animal Health and Veterinary Laboratories Agency (AHVLA);
- Environment Agency (EA);
- Health and Safety Executive (HSE);
- Food and Environment Research Agency (FERA);
- Food Standards Agency (FSA);
- Gangmasters Licensing Authority (GLA)³;
- Local Authorities;
- Natural England (NE);
- Rural Payments Agency (RPA), and;
- Veterinary Medicines Directorate (VMD).

The findings of this assessment have been split into the following three categories:

³ The Task Force recommended that the GLA should move its inspection regime to a more targeted, risk based approach using the principles of earned recognition. Whilst the GLA regulate the labour supplier rather than the farmer, they are still seeking views on how they could incorporate an earned recognition approach into their inspection regime.

Category	Rating
Inspections where there is no scope for applying earned recognition.	Red
Inspections where there is potential for applying earned recognition.	Amber
Inspections where earned recognition has already been implemented.	Green

Where potential has been identified, we are working to investigate, and where possible implement, earned recognition approaches.

A detailed assessment of inspection programmes, where potential for applying an earned recognition approach has been found, is given in [Table 1](#). The full list of inspections and a summary of this assessment can be found in [Annex D](#).

Earned Recognition Summit

In addition to exploring the opportunities for implementing earned recognition into on-farm inspections, we held an Earned Recognition Summit for Farming on 17th July 2013 to explore wider opportunities for how farmers and food processors can demonstrate their adherence to high standards, and therefore earn recognition.

We are committed to building on the ideas generated from the summit, which was attended by representatives from the farming industry and the Defra delivery network. We will progress these ideas in joint industry/government task groups who will work to develop them into feasible proposals for implementation.

We will provide an update on our progress towards implementing earned recognition, including through the outcomes of the earned recognition summit, early in 2014.

Table 1 - Inspections where there are opportunities for applying an earned recognition approach

Potential earned recognition benefit	Next Steps
Poultry meat marketing terms inspection – AHVLA (Approx. 250 inspections per year)	
<p>AHVLA carry out inspections to check compliance with EU regulations on marketing standards for poultry meat. These regulations set out the required frequency and location of checks.</p> <p>The regulations require an inspection to take place every turnaround. There may be some potential to implement earned recognition by taking into account membership of a farm assurance scheme. Such schemes carry out annual farm inspections which could replace one of the inspections currently carried by the regulator (AHVLA).</p>	<p>We are working with AHVLA to investigate the potential for implementing an earned recognition approach within this inspection regime. The intention is for preliminary results from this workstream to be available in October 2013.</p>
Egg marketing inspection - AHVLA (Approx. 8,000 inspections per year)	
<p>Egg marketing inspections by AHVLA take place to check compliance with EU regulations on marketing standards for eggs. Inspections are carried out on the basis of a risk assessment which takes into account factors such as results of previous checks, degree of segmentation in the processing or packing facility and quantity of eggs produced.</p> <p>Earned recognition, based on historic compliance rates for farmers, is to be introduced on a trial basis. This will reduce the frequency of routine inspection visits to medium and large producers to around one inspection a year (currently they are</p>	<p>The trial will commence in Autumn 2013. We are also working with the Lion Code to review compliance rates across the supply chain.</p>

subject to 2-3 inspections per year). Small producers are currently subject to less than one inspection a year and we do not envisage changing the frequency.

Farm inspection for environmental protection and inspection for water resource protection – EA (Approx. 2,700 inspections per year)

The EA (undertakes farm inspections to drive farm practices which protect and improve the environment. Main areas of regulatory activity include water quality, pollution prevention, waste management and water resource management.

There is potential for applying an earned recognition approach to these inspections which are carried out using a risk based approach.

As information about catchments increases and if data is accessible from external sources, the risk based approach taken will become more effective at targeting the highest risk areas and businesses. The EA already take account of previous performance history when selecting where to inspect.

The EA risk model was designed to incorporate data from external sources such as assurance schemes. The EA are working with Red Tractor assurance to trial access and use of data for two pilot counties (Nottinghamshire and Oxon). The outcomes of the pilots will be reviewed in autumn 2013.

The EA are also scoping how earned recognition could be implemented into water abstraction license inspections. This idea will be explored as part of the pilot study to implement earned recognition into Farm Inspections.

Control of notifiable pests and diseases of honey bees – FERA / NBU (Approx. 6,100 inspections in 2011)

Bees and bee colonies are inspected to prevent the introduction, and control the spread of, notifiable pests and diseases of honey bees.

These inspections are risk based depending on levels of disease outbreaks, with a small number randomly selected. Spot checks are also carried out on imported bees.

There is the potential to apply an earned recognition approach to semi-commercial and commercial beekeepers (Approx. 3-400 beekeepers). If a beekeeper has earned recognition, they will avoid a 1 day inspection by being able to take samples from their bee hives themselves. This will not only save time but it will also improve the self-reliance of beekeepers in managing and controlling disease risks.

In January 2013, we consulted on the proposals for the control of pests and disease of honey bees which included the implementation of an earned recognition scheme for bee farmers in respect of notifiable pests and diseases inspections. There was support for the introduction of such a scheme subject to further development of the criteria. This will be taken forward with stakeholders as part of the implementation plan for the bee health programme.

A pilot is underway and this will be extended next season (5 bee farmers in total). Protocols are expected to be developed with stakeholders by the autumn. The timing of when the scheme will become fully operational is dependent upon the trial results and uptake by bee farmers.

Animal feed inspections – Local Authorities (Approx. 13,000 inspections per year)

Animal feed inspections undertaken by Local Authorities will incorporate earned recognition by taking into account consistent compliance records and membership of approved assurance schemes.

All premises will still be subject to inspection by local authorities but businesses with Earned Recognition will have significantly reduced frequency of inspections unless the LA becomes aware of issues which require intervention.

The Food Standards Agency is currently working with industry assurance schemes to assess their standards and inspection criteria and ensure they effectively map on to the controls carried out by regulatory bodies. Once this has been completed, and the arrangements for sharing information between Local Authorities and assurance schemes finalised, a number of authorities in England and the devolved countries will pilot the arrangements.

Feedback from the pilot schemes will inform the final version of earned recognition for animal feed inspections with a view to full roll out across the UK in April 2014. It is expected that implementing this earned recognition will reduce on-farm inspections by approximately 8000 per year.

Agri-environment scheme (AE) eligibility inspections – RPA (Approx. 2,500 inspections per year)

Agri-Environment Scheme (AE) eligibility inspections are carried out in order to meet EU requirements to check that agri-environment scheme members are meeting the eligibility requirements of the scheme.

Inspections are carried out for a minimum of 5% of beneficiaries that are within the first 5 years of their AE agreement and a minimum of 2.5% of beneficiaries whose agreements have run for more than 5 years. Of these, 20% - 25% selected at random, the remainder by risk. The risk based inspections provide an opportunity for incorporating an earned recognition approach.

We are working with the RPA and NE to see if an earned recognition approach can be implemented into the risk based agri-environment scheme inspections. We are currently investigating whether there is evidence to support giving earned recognition to:

- Farmers who have recently passed a cross compliance inspection.
- Farmers who have passed an inspection under a previous agreement.

Cattle identification inspection (CII) – RPA (Approx. 1,800 inspections per year)

We are required under EU legislation to ensure that farms are recording and reporting cattle births, movements and deaths correctly, and that tagging requirements are being adhered to. This is to protect public health and mitigate disease risks in livestock, and it forms part of cross compliance requirements.

A minimum of 3% of the holdings on which cattle are registered are inspected. Of this, 20% are selected at random; the remainder are selected on a risk basis taking

We commissioned a research project, led by FERA, to build an evidence base on levels of regulatory compliance of assurance scheme members. We are currently investigating whether the [results of this research](#) provide a sufficiently robust evidence base to justify applying the principles of earned recognition to

<p>into account a number of different factors such as late registration of births and/or late reporting of movements or births. There is already an element of earned recognition in following years of holdings that are inspected and are compliant in a given year.</p> <p>There is potential to incorporate earned recognition into the risk based inspections for farmers who are members of an assurance schemes where:</p> <ul style="list-style-type: none"> • The assurance scheme requirements match those of the cattle identification legislation, and; • Where there is strong evidence confirming that membership of that assurance scheme substantially increases the likelihood of a farmer meeting these requirements. 	<p>members of assurance schemes for the purpose of these inspections.</p>
<p>Cross compliance inspection – RPA (Approx. 1,700 inspections per year)</p>	
<p>EU legislation requires us to check a certain number of farmers who are claiming under the Single Payment Scheme and agri-environment schemes every year to make sure that they are following the rules of cross compliance. This is to protect public funds.</p> <p>Under the rules of cross compliance, 1% of farmers claiming the single farm payment must be inspected. Of these inspections, 20% must be carried out randomly, therefore an earned recognition approach cannot be considered. However, 80% of these inspections are carried out on a risk basis where an earned recognition approach could be taken.</p> <p>If a farm assurance scheme is to be included as a form of earned recognition in</p>	<p>Using the results of the FERA research, we are working with the RPA and Red Tractor to see how earned recognition could be incorporated into the 2014 cross compliance inspection selection.</p>

<p>cross compliance inspections, it needs to meet two criteria:</p> <ul style="list-style-type: none"> • Its standards must meet the standards required by cross compliance. • There must be evidence to demonstrate that membership of the assurance scheme increases the likelihood of a farmer being compliant. 	
<p>Single payment scheme land eligibility inspection – RPA (Approx. 5,500 inspections per year, around 4,200 are carried out by remote sensing).</p>	
<p>A minimum of 5% of the claimant population must be inspected. Of this, 20% - 25% are selected randomly, the remainder by risk. An element of earned recognition has already been implemented since results of a previous cross compliance inspection are taken into account as part of the risk based selection of premises.</p> <p>There may be potential to incorporate an additional factor of earned recognition as part of this risk model.</p>	<p>We are working with the RPA to explore whether there is any potential for implementing earned recognition for the risk based element of these inspections.</p>
<p>Sheep and goat (SAG) identification inspection –RPA (Approx. 1,800 inspections per year)</p>	
<p>We are required under EU legislation to ensure that farms are recording and reporting sheep and goat births, movements, and deaths correctly, and that tagging requirements are being adhered to. This is to protect livestock against disease, and it forms part of cross compliance requirements.</p> <p>A minimum of 3% of sheep and goat keepers and 5% of the national flock are inspected. Of this, around 13% are selected for inspection at random; the remainder are selected on a risk basis, including such risk criteria as late movement reporting</p>	<p>We are currently investigating whether the FERA research provide a sufficiently robust evidence base to justify applying the principles of earned recognition to members of assurance schemes for the purpose of these inspections.</p>

and annual inventory non respondents. There is already an element of earned recognition in following years of holdings that are inspected and are compliant in a given year.

There is potential to incorporate earned recognition into the risk based inspections for farmers who are members of an assurance schemes where:

- The assurance scheme requirements match those of the sheep and goat legislation, and;
- Where there is strong evidence confirming that membership of that assurance scheme substantially increases the likelihood of a farmer meeting these requirements.

Annex A: On-going work to reduce regulatory burdens on farmers

In response to the Farming Regulation Task Force, and the NAO report on Streamlining Farm Oversight, government is working to reduce unnecessary regulatory compliance and enforcement burdens on farmers. In addition to implementing an earned recognition approach we are:

Increasing data sharing	Co-ordinating on-farm inspections	Reviewing risk based inspections
<p>What we've already done</p> <p><u>Overcoming barriers to data sharing:</u> We conducted a study on how to overcome barriers to data-sharing. The conclusions of this study have been promoted among Defra agencies and are already yielding tangible results. For example, the Environment Agency has now gained access to Customer and Land (CLAD) data, showing the location of all farm businesses with name, address and recorded land boundaries. This has allowed it to better target helpful communications to farmers in a particular geographic area.</p> <p>What we're doing</p> <p><u>'Find-it' tool:</u> We are exploring the potential for introducing a National Regulatory Information</p>	<p>What we've already done</p> <p><u>Regional Inspection Forums:</u> To improve the way inspections are co-ordinated, we are supporting the NFU and local authorities who are working together in Regional Inspection Forums. These forums, covering the West Midlands, East Midlands and East of England, help to:</p> <ul style="list-style-type: none"> • embed a more risk based approach to inspections at a local level; • encourage inspectors to share information with each other, and to contact farmers before they visit; • increase the farming community's understanding of how inspections are conducted, in order to reduce the 'fear factor' 	<p>What we're doing</p> <p><u>Reviewing of existing risk based approaches:</u> We have initiated a review of existing risk based approaches to on-farm inspections in order to build an evidence base of what risk based approaches are currently used. We will assess this evidence base to identify opportunities for improving risk based approaches. Undertaking this assessment will help to:</p> <ul style="list-style-type: none"> • Provide a framework to assess the suitability of inspection regimes to a risk based approach. • Potentially roll out risk based approaches to new inspection regimes. • Improve existing risk based approaches, in particular through inclusion of earned

<p>System (NRIS) tool for farm inspections which would increase data and intelligence-sharing between Defra agencies. This 'Find-It' tool has transformed the way in which the Health and Safety Executive targets inspections in other industry sectors. We have carried out a feasibility study which confirmed that this tool can be used by Defra agencies to improve the co-ordination, and risk based targeting, of on-farm inspections. We are now looking to roll out the tool as part of a pilot project to be initiated in 2013.</p> <p><u>Review of data requests:</u> We are conducting a review of data collected from farmers to determine whether we are collecting the right information to serve our underlying objectives. Through this review, we will look for opportunities to reduce the burden of unnecessary information requirements. Review complete by end of 2013.</p>	<p>associated with visits;</p> <ul style="list-style-type: none"> encourage farmers to approach inspection or competent bodies for advice if they are unsure about compliance, and reassure them that this does not invite an inspection. <p><u>Co-ordination of cross-compliance inspections:</u> In January 2012 the RPA, took over cross compliance visits to farms previously conducted by the Environment Agency, helping to simplify the inspection process;</p> <p>The AHVLA are also liaising with the RPA so that CII inspections can be combined with TB testing to reduce burdens on farmers.</p> <p><u>Guide to farm inspections:</u> We have published a plain-English guide to farm inspections so that farmers understand why they are inspected and how they are selected for inspection.</p> <p>What we're doing</p> <p><u>Feedback mechanisms:</u> We are working with our delivery partners, including the Animal Health and Veterinary Laboratories Agency, the Environment Agency, and the Rural Payments Agency to assess what on-farm inspection feedback mechanisms exist</p>	<p>recognition.</p> <p>Thereby:</p> <ul style="list-style-type: none"> Reducing regulatory burdens on low-risk businesses. Achieving greater value for money through more effective, evidence based, targeting of resources towards high-risk businesses.
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	<p>and how these can be improved. We think that allowing farmers an opportunity to provide feedback on inspections will aid us in fulfilling our commitment to improving the way that inspections are carried out.</p>	
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Annex B: Existing implementation of an earned recognition approach

Earned recognition is already in place for a number of inspection regimes as follows:

- Earned recognition was incorporated into cross-compliance animal welfare inspections in 2012. Membership of relevant UKAS accredited third party assurance schemes, including Red Tractor, was included in the risk model used to select premises for risk based inspections (random inspections also have to be carried out as required by EU law). As a result, in 2012 no farms covered by a farm assurance scheme were selected for an inspection as part of the 2012 risk based selection.
- In 2011, the Food Standards Agency incorporated earned recognition into Dairy Hygiene Inspections. All dairy farms producing raw milk for processing are inspected at least every 24 months except assured dairy farmers who have 18 monthly inspections from Assured Dairy Farms and official inspections every 10 years. This scheme has reduced the number of FSA inspections taking place on dairy farms by over 8,000 per year.
- The Environment Agency receives information from Red Tractor auditors in order to incorporate earned recognition into their Environmental Permitting Regulations (EPR) Pigs and Poultry Scheme. Around 740 of 1100 permitted farms are members. EA inspections are reduced from 1 per year to 1 every 3 years. Members get a £880 reduction in EA fees and time savings.

Several inspection regimes also include earned recognition through the incorporation of 'previous inspection result' in the risk criteria used to select premises for inspection. These include:

- Risk based cross compliance inspections.
- Risk based inspections on farms with agri-environment agreements (e.g. Entry Level Stewardship, Higher Level Stewardship).
- Animal by-products incinerators inspections.
- Wildlife licensing inspections.
- Veterinary medicines regulations inspections.
- Sheep and goats identification inspections.

- Cattle identification inspections.

Annex C: Background to on-farm inspections

Inspections can be split into two different categories: inspections following up complaints or suspicions that the law is being broken, or; inspections required on a regular basis as set out in law.

An earned recognition approach will not be applied to inspections that can take place to follow up complaints or suspicions as these inspections are necessary in order to protect health, animal welfare and environment standards, as well as our export trade.

Inspection programmes as set out in law often have strict requirements as to how many inspections need to take place within a given timeframe. It is in this area that there is scope to introduce earned recognition and take more account of the actions of industry and individuals who have a strong track record of high standards. As a result of these requirements, earned recognition is usually about better targeting of inspection activity, towards those with the highest risk of being non-compliant, rather than reducing the number of inspections carried out.

On-farm visits also take place as part of disease surveillance activity (e.g. TB Testing). Surveillance activity is unlikely to be modified as a result of earned recognition as it is carried out in order to maintain environmental, food safety and animal welfare standards, however, the information gathered through this surveillance activity could be used as a factor to earn recognition.

Number of on-farm visits

Figures from the NAO study on 'Streamlining Farm Oversight' estimate that a minimum of 114, 000 farm visits were made by government bodies in 2011-12 (on about 105,000 commercial holdings). Of these:

- 54% were disease surveillance activity;
- 11% were advisory visits about compliance, enforcement, scheme membership requirements or best practice (often requested, e.g. advisory visits from NE), and;
- 35% (40,170) of these visits were inspections.

Number of on-farm inspections

Of the 40,170 inspections which took place:

- 35,120 were planned inspections carried out for the purposes of ensuring compliance with regulatory requirements⁴, and;
- 5,050 were to follow up complaints or non-compliance.

⁴ It is estimated that 38% of this group are driven by EU legislation which can limit how premises are selected for inspection.

Annex D - On-farm Inspections List

	Inspection name	Who inspects	No. of inspections per year (Approx.)	ER potential
1	Welfare of animals (slaughter or killing) inspection	Animal Health & Veterinary Laboratories Agency	No figures available. Likely to be small as only a minority of farms kill on the premises.	Red: These inspections take place in response to applications or local intelligence. Impact on farm is minimal as only a minority of farms kill on the premises.
2	Animal health & welfare cross compliance inspection	Animal Health & Veterinary Laboratories Agency	1,700: 20% - 25% selected at random, the remainder by risk.	Green: Earned recognition for members of relevant UKAS accredited third party assurance schemes, including Red Tractor, was incorporated into cross-compliance animal welfare inspections in 2012.
3	Poultry meat marketing terms inspection	Animal Health & Veterinary Laboratories Agency	250: All producers using Special Marketing Terms	Amber: There may be some potential to implement earned recognition by taking into account membership of a farm assurance schemes. The regulations require an inspection to take place every turnaround, but one of these inspections (currently carried out by AHVLA) could in principle be replaced by an inspection from a farm assurance scheme.
4	Veterinary medicine residue	Animal Health & Veterinary	2,000: Selected at random	Red: Premises are selected on a random basis so an earned recognition approach cannot be applied.

	inspection	Laboratories Agency		To reduce burdens, AHVLA tries to collect samples from sites already being visited for other purposes.
5	Welfare on farms (WOFAR) inspection	Animal Health & Veterinary Laboratories Agency	Varies: Inspections take place in response to complaints or referrals from formal action (e.g. prosecution)	Red: These inspections only take place in response to complaints therefore there is no opportunity to implement earned recognition.
6	Egg marketing inspection	Animal Health & Veterinary Laboratories Agency	8,000: Selected on a risk basis	Amber: Earned recognition, based on historic compliance rates for farmers, is to be introduced on a trial basis. This will reduce the frequency of routine inspection visits to medium and large producers to around one inspection a year (currently they are subject to 2-3 inspections per year). Small producers are currently subject to less than one inspection a year and we do not envisage changing the frequency.
7	National feed audit inspection	Animal Health & Veterinary Laboratories Agency	1,495: Combined as much as possible with other AHVLA farm visits.	Red: These visits are a targeted surveillance activity and check for the presence of animal proteins in farm animal feed. The visits are targeted on the basis of type of animals kept, activities on farm & feed ingredients used. The presence of banned animal proteins may not be indicative of non-compliance by the farmer but the feed supplier and therefore it is not appropriate to target visits on the basis of farmer earned recognition.

8	Exempt finishing units and other TB-related livestock operations inspection	Animal Health & Veterinary Laboratories Agency	Varies: In response to applications	<p>Red: All finishing units must be inspected therefore we are unable to implement earned recognition. We have made a commitment to the European Commission, who co-finance Defra's TB eradication plan, to maintain and improve existing TB inspection protocols.</p>
9	Animal by-products incinerators inspection	Animal Health & Veterinary Laboratories Agency	<p>800 premises (not all on farm): Risk based approach which takes into account the type of animal carcass material alongside historical records of compliance.</p> <p>An annual visit for farmers demonstrating full compliance, including operating their incinerators to manufacturers' standards.</p> <p>Where compliance issues arise, this may generate immediate follow up visits & a three monthly visit before reverting to annual visits when AHVLA are satisfied.</p>	<p>Green: A type of earned recognition is already included in this inspection regime as the risk based approach takes into account historical records of compliance.</p> <p>Introducing an additional form of earned recognition will reap limited benefits given feedback shows farmers appreciate the yearly visit to ensure the incinerators are operated correctly.</p> <p>To reduce the burden of inspections further, egg marketing inspectors are used to cut out duplication of visits to egg producers who also have incinerators.</p>
10	Imported animals inspection	Animal Health & Veterinary Laboratories Agency	Varies: Mandatory check as animals are imported.	<p>Red: Currently all imported animals are inspected therefore there earned recognition cannot be implemented.</p> <p>However, as part of the review of the EU Animal</p>

				Health Framework Regulation and the EU Official Controls Regulation, the Commission are hoping to introduce a more risk based approach to controls which may allow for importers with a good history of compliance to have a lower level of physical check. It is likely, however, that all consignments of animals will still need to have a documentary and identity check.
11	Animal gatherings inspection	Animal Health & Veterinary Laboratories Agency approval / Local authority periodic inspection	200: Annual approval followed by risk based periodic inspection by AHVLA Local authorities also inspect and enforce at markets.	<p>Red: There is no scope for earned recognition as an annual visit must take place to provide assurance that high risk activity (all gatherings in particular markets) is being managed properly by industry.</p> <p>Green: Local authority inspections are risk based. They have the scope to take account of the effectiveness of the control systems in place at the gathering including membership of farm assurance, visits by other agencies and intelligence. At this time we do not think there is scope to extend the earned recognition already built into the risk assessment model.</p>
12	Farm inspection for environmental protection	Environment Agency	700: As required, part of catchment work. This has reduced since data was first provided due to resource on evidence gathering through	Amber: As information about catchments increases, and if access to external data about specific farm businesses improves, these inspections will become more selective using a risk

			catchment walkovers etc.	<p>model, therefore there is potential for an earned recognition approach to be applied.</p> <p>The EA are working with Red Tractor Assurance to trial access and use of data for two counties. The outcomes of the pilots will be reviewed in autumn 2013.</p> <p>The EA are also scoping how earned recognition could be implemented into water abstraction license inspections.</p>
13	Intensive pig and poultry farms requiring a permit inspection	Environment Agency & Certification Body Auditors	<p>Within assurance scheme, approx. 800: risk based (one third by EA, two thirds by certification bodies).</p> <p>Outside assurance scheme: 300</p>	<p>Green: Earned recognition has already been implemented. Members of the Pig and Poultry Assurance Scheme receive an inspection from the Environment Agency once every three years, rather than on an annual basis.</p> <p>878 businesses (76%) of permitted farms are in the scheme in England & Wales. 827 of these businesses are in England. They also benefit from reduction in permit fees of £880 per year.</p> <p>300 farms are not in the assurance scheme and are inspected annually.</p>

14	Inspection for water resource protection	Environment Agency	2,000: Risk based.	<p>Amber: Because the risk to water resources is dependent on weather/rainfall/drought, the number of inspections can vary significantly.</p> <p>The EA are scoping how earned recognition could be implemented into water abstraction license inspections, potentially using farm assurance data.</p>
15	Plant health and seeds control inspection	FERA	2,500: not just on-farm inspections, includes checking import consignments. Driven by either concerns of pest or disease presence, or because the individual requests an inspection to certify the phytosanitary status of a crop to facilitate export needs.	<p>Red: Whilst an earned recognition approach cannot be applied to the on-farm inspections, work is ongoing to collect farm records to reduce the time burden of those inspections carried out.</p>
16	Control of notifiable pests and diseases of honey bees inspection	FERA	6,000: Risk based, with a small number randomly selected and spot checks on imported bees	<p>Amber: The introduction of an earned recognition scheme in respect of the inspection of colonies for pests and diseases will be taken forward with stakeholders.</p>

17	Dairy hygiene inspection	Food Standards Agency	1,100: Risk based	<p>Green: Earned recognition was incorporated in 2011. All dairy farms producing raw milk for processing are inspected at a frequency of six months, two years, or 10 years. The inspection frequency is determined using a risk rating.</p> <p>Assured dairy farmers who earn recognition have 18 monthly inspections from Assured Dairy Farms and official inspections from the FSA every 10 years. This scheme has reduced the number of FSA inspections taking place on dairy farms by over 8,000 per year.</p> <p>Farms that currently qualify for earned recognition can lose this right if the industry representative audits identify one major or three minor non compliances.</p>
18	Gangmaster licensing inspection	Gangmasters Licensing Authority	Varies: Inspections are made on the labour employer not the farmer. Inspected on initial application, then risk based.	<p>Green: Whilst these inspections do not inspect the farmer, the Task Force recommended that that the GLA should use the principles of earned recognition. The GLA are seeking views on how they could incorporate an earned recognition approach into their inspection regime.</p> <p>The GLA are considering how earned recognition can operate in relation to the labour providers they regulate, who supply workers to farmers, and others. As such their focus is the labour provider</p>

				<p>not the farmer. However, the GLA already captures information on the labour users to ensure that, for example, where it visits a labour user who uses labour provider A it does not re-visit the same labour user if it is inspecting labour provider B, who may supply labour to the same labour user.</p> <p>However, as all GLA interventions (criminal and civil) are risk based applying the national intelligence model, it may re-visit that labour user if the intelligence identifies the risks are prevalent at that labour users premises only. In the last 4 months there have been 78 labour user premises visits only 13 of which were farms</p>
19	Local authority farm inspection	Local Authorities (TSOs)	Varies: Determined individually by each local authority. Many are targeted responses to specific referrals or complaints.	<p>Green: Most Local Authorities combine standard risk factors and local intelligence, including information from other agencies and taking account of membership of farm assurance schemes.</p> <p>Amber: Animal feed inspections undertaken by Local Authorities will incorporate earned recognition through approved assurance schemes. A pilot of this earned recognition scheme is to begin shortly with full roll out expected in 2014. This will reduce the number of inspections completed on farms.</p>

20	Sites of Special Scientific Interest (SSSIs) inspection	Natural England	800: Risk based. All SSSIs are visited but the frequency of the visits depends on the sensitivity of the features on the site and the risk to their condition. Reports of damage to or unauthorised works on an SSSI are also followed up.	Red: These inspections are already risk based but the level of risk is determined by the sensitivity of the features on the site rather than action taken by a farmer therefore earned recognition cannot be applied.
21	Wildlife licensing inspection	Natural England	60: Risk based although for some types of licence all applicants are checked.	Green: Once a licence has been issued a risk based inspection may take place. One factor considered as part of this risk basis is experience in undertaking the task covered by the licence. This incorporates an element of earned recognition as previous inspection result is taken into account.
22	Animal poisoning inspection	Natural England	60: In response to complaints from the public and others. The facts available are carefully examined before deciding whether to make a visit.	Red: These inspections only take place in response to complaints therefore there is no opportunity to implement earned recognition.
23	Environmental impact assessment (EIA) inspection	Natural England	50: In response to reports of breaches of EIA regulations, or following the submission of an EIA screening application.	Red: Inspections carried out in response to a reported breach cannot incorporate earned recognition. Given that approximately 50 inspections take place each year, the impact of implementing earned recognition would be minimal.

24	Cross compliance inspection	Rural Payments Agency	1,700: A minimum of 1% of the claimant population. Of this, 20% - 25% selected by random, the remainder by risk.	<p>Green: If a farm has previously been selected for a cross compliance inspection and was found to be fully compliant, the chance of being selected again for another risk based inspection is reduced. These farmers will however still be in scope for being chosen for a 'random' cross compliance inspection, as required under EU law.</p> <p>Amber: We are working with the RPA and Red Tractor to explore implementing earned recognition for Red Tractor farmers into the 2014 cross compliance inspection round.</p>
25	RDPE compliance monitoring inspection	Rural Payments Agency	200: A minimum of 5% of total eligible expenditure over the whole Programme. Of this, 25-30% selected at random, the rest by risk.	<p>Red: This is an inspection to check for fraud and error. It is unlikely that a proxy to indicate compliance could be found therefore there is no potential to implement an earned recognition approach.</p> <p>Only around 30% of these inspections take place on-farm, therefore the impact of implementing an earned recognition approach would be minimal.</p>
26	Agri-environment scheme (AE) eligibility inspection	Rural Payments Agency	2,500: A minimum of 5% of beneficiaries that are within the first 5 years of their AE agreement. A minimum of 2.5% of beneficiaries	<p>Green: A form of earned recognition is already in place as previous inspection result is a factor taken into account. If a farm has already passed an inspection during the life of its agri-environment</p>

			whose agreements have run for more than 5 years. Of these, 20% - 25% selected at random, the remainder by risk.	<p>agreement then its chance of being inspected again under the same agreement is reduced.</p> <p>Amber: We are also working with the RPA and Natural England to see if there are other opportunities for implementing earned recognition into this inspection regime.</p>
27	Single payment scheme land eligibility inspection	Rural Payments Agency	5,500: Of these, around 4,200 are by remote sensing and 1,300 take place on farm. A minimum of 5% of the claimant population. Of this, 20% - 25% selected random, the remainder by risk.	<p>Green: Farmers can already earn recognition by submitting their claim form on time.</p> <p>Amber: We are working with the RPA to explore whether there is any potential for implementing earned recognition for the risk based element of these inspections.</p>
28	Sheep and goat (SAG) identification inspection	Rural Payments Agency	1,800: A minimum of 3% of sheep and goat keepers and 5% of the national flock. Of this, around 13% selected at random, the remainder by risk category	<p>Green: If a farm is selected for an inspection in a given year and is found to be fully compliant, the probability of being selected again for another risk based inspection in the following years is reduced. The risk based selection also ensures an element of earned recognition for farms that perform well by including such risk criteria as late movement reporting and annual inventory non respondents.</p>

				<p>Amber: We are currently investigating whether the FERA research provides a sufficiently robust evidence base to justify applying the principles of earned recognition to members of assurance schemes for the purpose of these inspections.</p>
29	Cattle identification inspection (CII)	Rural Payments Agency	1,800: A minimum of 3% of the holdings on which cattle are registered. Of this, 20% selected at random, the remainder are selected on a risk basis.	<p>Green: If a farm is selected for an inspection in a given year and is found to be fully compliant, the probability of being selected again for another risk based inspection in the following years is reduced. The risk based selection also ensures an element of earned recognition for farms that perform well by including such risk criteria as late registration of births and late reporting of movements or births.</p> <p>Amber: We are currently investigating whether the FERA research provides a sufficiently robust evidence base to justify applying the principles of earned recognition to members of assurance schemes for the purpose of these inspections.</p>
30	Weeds inspection	Natural England	100: In response to complaints	<p>Red: These inspections only take place in response to complaints therefore there is no opportunity to implement earned recognition.</p>

31	Veterinary medicines regulations inspection (medicated feeding stuffs)	Veterinary Medicines Directorate	150- 200 inspections of farms approved to manufacture feed containing veterinary medicines and/or specified feed additives (coccidiostats) for feeding to their own livestock.	<p>Green: Inspections are risk based with a maximum interval of 36-48 months for compliant businesses. The inspection frequency is increased for less compliant businesses. Earned recognition is therefore implemented as the previous inspection result is taken into account when deciding on the frequency of the next inspection.</p> <p>The VMD has delegated the inspection of 80+ fish farmers manufacturing medicated feed to Cefas. Cefas inspects fish farmers every 6-12 months for fish health monitoring purposes, so this arrangement has reduced the inspection burden on those farmers.</p>
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