

**Royal College of Veterinary Surgeons Consultation Response – Food Standards Agency Consultation – A new approach to charges for official controls on meat: delivering efficiency and reform**

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the education, and ethical and clinical standards, of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.
2. The RCVS considers that in relation to the regulation and inspection of slaughterhouses, meat cutting plants and game handling establishments, ensuring the highest levels of animal welfare and protecting public health are of paramount importance. The RCVS strongly supports the finding of the FSA Board in this regard, that ‘providing the best possible protection for consumers from food risk should not be based on economic circumstance or the ability of the industry to pay’.
3. In this response the RCVS does not seek to comment on whether full cost recovery is preferable or indeed upon the definitions used in the proposals. Instead the RCVS limits its comments to the potential adverse effects that the proposals may have upon the welfare of animals destined for slaughter and to the health of people consuming the produce of such animals.
4. The FSA analysis that underpins the consultation exercise provides a detailed assessment on the likely economic impact of the proposals, but does not address their potential impact on either animal welfare or human health. Addressing this omission must be a priority.

**Animal Welfare – Travelling Time to Slaughter**

5. The RCVS is concerned that an increase in charges for slaughter plant operators could lead to a reduction in slaughter plants. This has the potential to increase the travelling time of animals going to slaughter, with obvious animal welfare implications.
6. These concerns are backed up by statements in Annex A to the consultation document. Paragraph 40 under the section entitled ‘Evidence Base’ considers how establishments will respond to the burden of full cost recovery: ‘theoretical analysis suggests that large-scale establishments may look to spread this cost to reduce their average operating costs through economies of scale’. Furthermore, the paragraph which follows (41) notes that ‘smaller establishments continue to operate on narrow margins, some may no longer find it viable as the concentration of larger scale establishments increases’.
7. The FSA should provide further analysis as to the likely effect of a reduction in slaughter plants on animal welfare, and in particular upon the average travelling time of animals going to slaughter. The FSA should then make detailed proposals to ameliorate any adverse effects that are identified.

## **Illegal Slaughter**

8. The RCVS is concerned that if the FSA proposals lead to a reduction in slaughter plant numbers and increased costs for their users, this could serve to increase the likelihood of producers resorting to illegal slaughter, particularly in the current economic climate. This could have a real impact upon the welfare of animals and human health.
9. The RCVS is particularly concerned that any increase in the level of illegal slaughter will reduce the effectiveness of national disease monitoring programmes and therefore has the potential to contribute to future disease outbreaks by preventing their early detection. The importance of disease monitoring at slaughter is highlighted by the fact that the 2001 UK Foot and Mouth outbreak was initially detected at an abattoir in Essex.
10. The consultation document notes that a 'two tier market' has developed in the UK, with large-scale abattoirs servicing large-scale retailers, whereas small low-throughput establishments have 'opted for niche markets increasingly providing a local slaughter facility service to farmers who sell their meat directly to the consumer'. If such small-scale establishments, which are able to handle the stock from small producers, 'no longer find it viable' to operate under the new proposals, then this would be of particular concern as it could lead to an increase in illegal slaughter.
11. The RCVS considers that the FSA must provide detailed analysis as to what effect the proposals may have on incidents of illegal slaughter and how the provision of legal slaughter facilities can be maintained for small-scale producers.
12. The RCVS strongly supports the FSA proposals to undertake a Post Implementation Review (PIR). The RCVS considers that in order to be effective, such a review must comprehensively address any unintended consequences or adverse effects that the proposals may have had on animal welfare or public health. In addition, the review must seek to monitor any significant changes in the numbers and classes of animal presented for slaughter, in order to establish whether the implementation of the proposals had resulted in an increase in illegal slaughter.
13. If clarification on the above comments is required, please do not hesitate to contact the College. Representatives from the RCVS would be happy to meet with officials and Ministers to discuss and expand upon this statement.

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