POSITION PAPER: A FUTURE FOR SMALL ABATTOIRS

The Government's stated preference is to have animals killed as close to the point of production as possible.

To achieve this objective and maintain a good geographical spread of plants, it is vital that the few remaining small local abattoirs are encouraged to stay in business. Such encouragement may also assist previously closed abattoirs to re-open as well as fostering new start-ups.

The view of National Craft Butchers (previously National Federation of Meat and Food Traders) is that the necessary encouragement can only be facilitated by constructive and innovative government involvement.

Reform of Inspection Procedures

National Craft Butchers (NCB) believes that the most beneficial and urgent requirement is to reform inspection procedures.

Although many of the necessary reforms will require regulation change it may also be possible to re-interpret existing regulations, remove any gold plating and find more flexibilities in the existing regulations. Other member states (notably France) have done this in the past to good effect.

The overriding principle is that meat inspection should be risk-based and proportionate.

The current inspection regime is cumbersome, inefficient and expensive to run, with costs falling on operators and the taxpayer. The Food Standards Agency and the service provider are also finding it increasingly difficult to provide sufficient inspection personnel.

NFMFT View of Current Ante-Mortem Inspection Problems

• The FBO already must have a trained animal welfare officer on site.
• The service provider Eville and Jones has already flagged that there is a chronic shortage of vets for meat inspection and that they are training meat hygiene inspectors (MHI) to carry out inspections currently undertaken by vets; para-professionals.

• The FSA’s own statistics show a minute number of animals rejected at ante-mortem in small slaughterhouses.

• The experience of many small FBO’s of ante-mortem inspection it that it is cursory, and rule rather than risk based.

• At present it is possible for a licensed game hunter to shoot a deer and inspect it and provide it for sale through a retail premises having had a half-day course on inspection. There is no ante-mortem here and makes the arrangements in abattoirs look disproportionate.

• Also, small poultry producers can slaughter up to 10,000 birds a year on the farm, with no ante-mortem inspection using only the basic food hygiene regulation 852/2004.

• If ante-mortem is not carried out at the abattoir before an animal is killed, then the carcass must be disposed of and is not allowed into the food chain.

• This can present problems for animal welfare. If an animal is injured in transport or has for example a heart attack, then the FBO is faced with a choice. Dispatch the animal on compassionate grounds and waste the carcass or let the animal suffer and wait for a vet to complete ante-mortem then it can enter the food chain. There must be a better solution than this?

• A farmer can legally shoot and process an animal on his farm for his own consumption but a trained slaughter man cannot kill an animal without ante-mortem on compassionate grounds without wasting the carcass. This is despite there being a further post mortem check by an MHI who could reject the carcass if there was any problem.

Solutions to Ante-Mortem Problems

• Under the present regulations “only healthy animals should be presented for slaughter for human consumption”. Therefore, in addition to the information the farmer must provide on the movement license there should be a tick box saying that the animals presented are healthy. If the farmer is unsure of this he can call for veterinary attendance.

• The FBO would have a member of staff trained to identify potential problems with animal health at ante-mortem. This could be included in the new trailblazer Abattoir apprenticeship.

• The service provider has already started to train MHI’s to take over some of the work carried out by Vets. The MHI’s could take over ante-mortem inspection.

• If a problem was identified at the ante-mortem by either FBO or MHI then the animal would be isolated for later veterinary inspection. This exact system has been in operation in France for many years.

• In practise an MHI (para-professional) could do the ante-mortem on one day, then complete necessary paperwork followed by the post-mortem. This would have to be agreed with the
FBO and provider to make best use of resources on both sides. Eventually we would like to see the FBO responsible for ante-mortem and the MHI for meat inspection.

• The FSA would have to make a judgement as to whether local authorities (LA) or private contractors were best placed to provide this service. *(We would guess some LA’s would like to provide the service some not, so it could be mix of the two.)*

• With a system that’s regulated in proportion to risk, similar to what LA do for food retail premises, this opens up the scope for other projects. This could include mobile abattoirs where a standalone small plant is not viable, serviced through Local Authorities.

• Veterinary supervision can be maintained and enhanced by CCTV, extended use of communication technology, the availability of para-professionals and specific FBO training.

• If these measures were adopted, we believe that public confidence in meat inspection could be maintained whilst at the same time saving on resources for the taxpayer and helping small plants to remain viable.

Post-Mortem Inspection

All small plants should benefit from delayed post-mortem inspection (cold inspection) if facilities allow and the plant is compliant.

Cold inspection should be based on what is required and not on what resource is available, as appears to be the case currently.

Once a business agreement is in place it must be adhered to by both operator and service provider unless both parties agree to change.

Due to the small numbers processed it is usually not economic or a good use of recourses to have full veterinary attendance in small plants.

Other Issues Where Government Could Help

In addition to regulatory burdens small operators are also burdened by:

• High and disproportionate animal by-product (ABP) waste collection charges.

• Very limited choice of ABP collection options and no competition amongst collecting companies who stick to defined areas and do not encroach on each other’s territories.

• Most ABP waste collectors are all part of the same large holding company.

• High level of bureaucracy/paperwork *(Get FSA, AHDB, BCMS, EAM and ARAMS to communicate to save small operator time in duplicating information. Also, a general review of all paperwork and administration procedures needed to include innovate use of modern technology).*

• Recent IT solutions which tend to increase administration time and burden on small plants.

• High business rates
• A collapse in the value of hides and skins. \textit{(Has China cornered the market?)}

• Difficulty obtaining grant funding \textit{(Currently funding has been approved in Wales- what about the rest of the UK?)}

We support the call from the Sustainable Food Trust to establish a task force to carry out an in-depth review on all issues affecting small abattoirs and to make recommendations.

\textbf{What Will Happen if Things Stay as They Are?}

• The quality of inspection will slip as the service provider struggles to provide staff.

• More small plants will close from what they see as relentless bureaucracy and over-regulation.

• Animals will not be able to be processed in local small abattoirs and could potentially travel further to slaughter.

• Small farmers who want to process their own stock for retail sale will find it uneconomic to do so.

• The investment made through grant aid for farm diversification into meat cutting rooms and farm shops could be wasted as farmers find it difficult to find someone to process their stock.

• Farmers who use kill and cut facilities particularly when market prices are poor will no longer have this route to the consumer.

• Illegal slaughter will become more prevalent than it is with all the ramifications for animal welfare and public health.

• After Brexit farmers may need the small plants more than ever to process their stock for local consumption as tariffs and exchange rates could make export more problematic.

• Public opinion that it is bad for animal welfare for animals to travel long distances to slaughter will grow.

\textbf{Conclusion}

• We are at a cross roads in the provision of meat inspection.

• If small abattoirs close this will be bad for animal welfare as animals are transported further from the point of production.

• A choice must be made whether to end over-regulation in favour of a risk-based approach or plough on with a system that fits regulation, but which is contributing to the closure of small plants.
The National Federation of Meat and Food Traders

APPENDIX TO POSITION PAPER ON FUTURE OF SMALL ABATTOIRS

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SMALL LOCAL ABATTOIRS ARE BETTER FOR ANIMAL WELFARE

1. There are many social, environmental and economic benefits when slaughtering animals close to the point of production. One of the biggest benefits is enhanced animal welfare.

2. Producers and public care deeply about their animals and have strong concerns about the adverse impact of longer journeys on the health and welfare of their animals.

3. Many producers prefer to transport their animals themselves on welfare grounds, but this is not practical if there is no facility nearby.

4. Abattoir operators and craft butchers share a farmer’s concern for welfare and treat all animals in their care with respect.

5. Additionally, meat business operators have strong business reasons for reducing animal stress which detrimentally affects meat quality.

6. The British public have long regarded excessive journey times as cruel and inhumane since the publicity created by live animal export protests and the foot and mouth outbreak.

7. 43% of the public listed animal welfare as a food issue concern in a recent survey by the Food Standards Agency. The public perception is that long journey times for animals is not acceptable.

8. Most animals have never been taken off the farm before and will be anxious for longer on journeys of greater distance, especially if they are not familiar with their handlers.

9. The sights, sounds, smells and the much less busy environment at smaller abattoirs are more akin to what animals are familiar with on the farm.

10. Small abattoirs are able to accept pigs in family groups, reducing the possibility of fighting which leads to stress.

11. By mixing Ewes with lambs particularly in Spring we are able in a small abattoir to imitate the environment in the field and the lambs appear more settled.