

Performance Reporting

1 Purpose of the paper

- 1.1 This paper provides a six monthly update for the Board on the FSS performance in delivering key activities. Annex A sets out the metrics, and Annex B provides additional context for them.
- 1.2 The Board is asked to:

- **Consider and comment** on reported performance metrics

2 Strategic Aims

- 2.1 This work supports the FSS Strategic Outcome 6 – FSS is efficient and effective.

3 Background

- 3.1 This paper builds on the Board discussion on performance monitoring and proposed metrics in November 2017. The Board's Terms of Reference confirm that the Board has overall responsibility for the actions and decisions of FSS, and is ultimately accountable to the Scottish Parliament for policy delivery, compliance with statutory duties and performance against agreed strategic objectives.

4 Discussion

- 4.1 The Board is asked to note that the Executive is reviewing the existing Annex A performance metrics, and exploring possibilities for adding in additional metrics relating to areas of FSS business over and above the operational delivery areas reported in Annex A, and will update the board on progress. In the interim the layout has been enhanced and the board are asked to comment on the new layout.

5 Annex A metrics

5.1 Animal Welfare

- 5.1.1 Welfare breaches on farm and in transport remain at a much higher level than those in plant with a noticeable decline during the reporting period in abattoir incidents score 4. Incidents on farm and in transport have made up 77% of the overall animal welfare incidents during the past 6 months, this is a 1% increase on the same reporting period as last year, and abattoir incidents have seen a 1% reduction during the same period as last year. FSS has a zero tolerance of welfare issues, however, it should be noted that the six monthly total incidents for the period between 01/04/2019 to 30/09/2019 equates to 0.016% of total red meat and 0.0008 % poultry throughput.

5.2 Visible Contamination

- 5.2.1 Contamination figures continue to remain low for the reporting period, with meat health inspectors and official veterinarian continually striving to ensure that the contamination remains low.

5.3 Veterinary Audit

5.3.1 The most frequent major non-compliances raised against requirements during audits from April this year in all plants are as follows: monitoring procedures for critical control points to help avoid contamination entering the food chain.

5.3.2 Overall, the compliance trend continues to remain fairly stable with the majority of establishments reporting good or generally satisfactory compliance levels.

5.4 Shellfish Sample Compliance

5.4.1 There is nothing unusual to report on shellfish compliance with trends remaining consistent.

5.5 Local Authority Audit

5.5.1 No new audits were conducted during the period 1st April 2019 to 30th September 2019.

5.5.2 One audit has been closed during the reporting period and 1 audit has been published since the last report.

6 European Union considerations

6.1 None required at this stage.

7 Conclusion and recommendations

7.1 The Board is asked to:

- **Consider and comment on reported performance metrics**

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Background and context for Metrics

Animal Welfare

A key function of FSS is to ensure that animals are protected by Food Business Operators (FBOs) prior to and during slaughter and killing. FBOs have a duty under the Welfare of Animals at the Time of Killing (WATOK) Regulations 2012 and welfare controls in approved meat establishments are delivered by the FSS veterinary and inspection personnel on behalf of Scottish Government (SG).

FSS also plays an important role in relation to assisting the Animal and Plant Health Agency (APHA) and Local Authorities (LAs) through providing information relating farm and/or during transport. These types of incidents are discussed at a strategic level by the Scottish Livestock Welfare Group involving all enforcement authorities relevant to animal welfare. At a local level Animal and Plant Health Agency and Local Authorities risk assess incidents reported to them and investigate accordingly.

Visible contamination of meat carcasses

Incidence of visual contamination presented at the final carcass inspection point by the Food Business Operator has been recorded since 2013 and are taken as a proxy measure of hygienic production. Scotland has historically recorded lower contamination levels than other UK countries through an active programme of industry and individual plant engagement and ensuring consistency and accuracy of recording through regular assessment and monitoring of the FSS systems applied. The Board previously noted that the FSS use of a Scottish average by which to measure performance may give the impression of this being an acceptable target. However, plant level management of contamination monitors trends in daily contamination as the primary means of control rather than performance against a Scottish average.

Other EU countries do not record contamination of every carcass, preferring to rely on assurance sampling by the FBO and verification of such during audit.

As the Board will recall, this recording of contamination takes place at the final inspection point before a health mark is applied. As an added assurance we also check a sample of carcasses after post mortem inspection to satisfy ourselves that appropriate inspection standards are being applied. This is far more rigorous than the previous approach of assurance sampling for a particular period of time. It is also worth emphasising that any contamination has to be rectified and re-examined before it can be declared for human consumption.

Veterinary audit

Veterinary audits of approved meat establishments are part of a suite of official controls carried out by FSS. The audit arrangements apply to all approved meat establishments under veterinary control in Scotland and include:

- Red meat / farmed game slaughterhouses
- Poultry meat slaughterhouses
- Cutting plants
- Wild game handling establishments

- Minced meat, meat preparations and mechanically separated meat plants co-located with slaughterhouses or cutting plants
- Meat product plants co-located with slaughterhouses and cutting plants co-located cold stores

Audits are risk-based as required by Article 4 of Regulation EC No 854/2004, and take into account the following:

- Public health risks
- Animal health risks (where appropriate)
- Animal welfare risks (where appropriate)
- Type of process carried out
- Throughput
- FBOs past record of compliance with food law

The aim of veterinary audit is to verify compliance with legal requirements and to ensure adequate FBO standards in relation to public health, animal health and welfare. Sections of the audit are based on the priorities that have been agreed between FSS and SG as we carry out on a wide range of controls on their behalf. Audit findings aim to provide individual FBOs as well as the relevant competent authority (FSS and SG) with information on areas for correction or improvement as well as providing assurance that performance and compliance is as required.

In addition to the audit of good hygiene practice, the auditor must verify the FBO's continuous compliance with their own procedures for, amongst others, all aspects of animal by-product handling (including Specified Risk Material (SRM) controls for BSE), animal identification, animal health and welfare, etc.

During audit of HACCP-based procedures, the auditor must check that the operator's systems of work and food safety management provide assurance that meat is free from pathophysiological abnormalities or changes, faecal or other contamination and SRM.

Following audit, plants are awarded an Audit Outcome as detailed below:

Audit Outcome	Tolerance for audit outcome	Standalone Cutting Plants	Slaughterhouses/ Game Handling Est. /Co-located Cutting Plants	Follow Up Partial Audits of critical and major NCs
Good	No majors or critical on day of audit or during audit period	12 months	18/12 months	N/A
Generally Satisfactory	No more than 2 majors during audit or during audit period rectified promptly No critical during audit period	12 months		Within 3 months
Improvement Necessary	3-6 majors during audit or during audit period No critical during audit period	3 months		Within 1 month
Urgent Improvement Necessary	1 critical or >6 majors during audit or during audit period	2 months		Within 1 month

Subsequent audits are therefore scheduled on the basis of the audit outcome.

Reports are produced following each audit and sent to the FBO. The report details the non-compliances identified and provides an indicative timescale for the business to address them. Audit reports will be published on the FSS website after the period for appeals has expired. Where applicable (in accordance with the table above), an additional partial audit may be carried to assess the actions taken to address the non-compliances raised at audit. Where significant non-compliance is noted, additional checks on performance may be undertaken in the form of Unannounced Inspections.

Shellfish sample compliance

FSS carries out an annual review of all Scotland's shellfish production area classifications using the previous three year data-set, or less if not available, from the production areas to inform classification award decisions for the coming classification year. This process is carried out in accordance with EU guidance. FSS monitors these classified production areas for the presence of marine biotoxin producing phytoplankton in waters and marine biotoxins in shellfish flesh.

Changes in the number of classification awards will vary due to the following reasons:

- Changes in levels of *E.coli* reported throughout the year
- Decisions, taken by harvesters, not to continue with the classification
- Insufficient samples submitted to either maintain the same level of classification award i.e. 10 samples required for Class A or a minimum of 8 samples to retain a classification award
- New classification awards

Levels of marine biotoxins in shellfish samples from shellfish production areas determine whether an area should be open or closed for harvesting. During the course of the year, sampling contractors collect monthly *E.coli* samples according to the sampling plan and compliance can be routinely affected by a number of factors including the following:

- Inactive harvesting
- Availability of vessels
- Poor weather and/or
- Logistical issues – performance of carrier

Local authority audit

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. Similar functions are also contained within section 7 of The Official Feed and Food Controls (Scotland) Regulations 2009 which implement the requirements of Regulation (EC) No 882/2004.

As a designated competent authority as defined within Schedule 5 of the Official Feed and Food Control (Scotland) Regulations 2009, LAs are required to comply with Article 4(6) of Regulation (EC) No 882/2004 (audit of official control delivery). In order to help LAs fulfil this requirement, (as part of our central role as described above) FSS will continue to deliver external audit arrangements in addition to the above.