



Dr Hazel Wright, Senior Policy Officer, Farmers' Union of Wales, Llys Amaeth, Plas Gogerddan, Aberystwyth, Ceredigion, SY23 3BT

Tel: 01970 820820
Fax: 01970 820821
E-mail: hazel.wright@fuw.org.uk

Vicki Reilly
Agriculture Team
Food Standards Agency
11th Floor, Southgate House
Wood St
Cardiff CF10 1EW

vicki.reilly@foodstandards.gsi.gov.uk

9th June 2010

Dear Ms Reilly,

PROPOSAL TO RECOGNISE ASSURED FARM STATUS IN SETTING THE FREQUENCY OF OFFICIAL ON-FARM INSPECTIONS IN THE DAIRY SECTOR

Thank you for inviting the Farmers' Union of Wales to contribute to the above consultation. Following an internal consultation with its twelve County Branches and consideration by the central Milk and Dairy Produce Committee, the Union submits the following comments for your consideration.

The Union broadly welcomes the plan to target dairy sector inspection activity on the basis of risk, and agrees that a strategy for integrating on-farm advisory and enforcement visits is required in order to reduce the inspection-related burdens on farmers and improve value for public money.

In general, members welcomed the *objectives* of the proposals outlined in the present consultation, and it is believed that, when fully considered and evaluated, the proposals could function to provide an incentive for farms to move towards lower risk categories by having a longer time interval between inspections than their higher risk counterparts.

The Union notes that the intended effect of the present consultation is to reduce the costs of inspection on farms that have Assured Dairy Farm (ADF) status by reducing the frequency of official inspections. However, the premise of this policy objective relies heavily on the validity of using ADF audit results to adjust Animal Health Dairy Hygiene (AHDH) inspection frequencies, by comparing the risk categorisation of farms following their AHDH inspections with the number of relevant non-conformances following their ADF audit.

Members were concerned that strength of argument offered as justification for such an approach did not reflect the results of the analysis document, which show only a selective correlation between the two types of inspection. Less than half (46%) of the

farms included in the analysis received the same assessment from both schemes, suggesting only a limited link between the two measures of risk. Furthermore, given that the analysis demonstrates that the comparison between the two schemes is negligible for farms categorised as high risk, members were concerned that there may be a fundamental and important disparity between the schemes which only becomes apparent upon the comparative analysis of farms contained within the higher risk categories. Unfortunately, the strength of the correlation analysis undertaken (as a probability factor), for both pooled data and risk category groups, was not reported in the present study, and the comparability of the two schemes therefore remains unclear.

The Union notes the results of the independent evaluation and comparison of the two schemes as undertaken by the University of Reading. Differences of importance include the fact that the ADF schemes are much broader in remit and are not risk based (≠routineø). Members believed that the inspection undertaken through the AHDH scheme represented a more robust and legitimate measure of hygiene and consumer safety, and questioned the comparative analysis of the two schemes, given that ADF inspections are not risk based. In general, members believed many of the factors measured under the ADF were superfluous to requirements, and did not function to protect consumer safety. In the present consultation, it is suggested that AHDH inspection frequency would be based on the results of ADF assessments, despite the ADF being both ≠broaderø and more ≠routineø (non risk-based).

Several members therefore expressed concerns that the present consultation suggested an elevation of the status of the ADF scheme without conclusive evidence to suggest the validity of doing this.

Thus, while the Union welcomes proposed changes in inspection frequency which are genuinely risk based, it is believed that the broad range of factors measured under the ADF scheme, and their importance and relevance to dairy hygiene and consumer safety, should be further evaluated in order to properly ensure that businesses are not unfairly penalised due to poor correlations between AHDH and ADF scores.

Members also expressed concern regarding the consequences of non-conformance to many aspect of the ADF scheme, including the fact that *≠non-conformances [with ADF], not considered to be critical, must be rectified within 28 days from April 2010ø* for the farm to retain its assured status. The Union would question the need for factors which are not considered to be a risk to hygiene and consumer safety to be rectified within 28 days, and questions the validity of many of the variables measured under the present ADF scheme.

The Union therefore believes that further analysis is needed to determine the degree to which both inspection regimes and subsequent classifications may be utilised to reduce the inspection burden on the dairy sector. Moreover, it is suggested that additional and unnecessary factors which affect ADF statuses might be at least partly responsible for the lack of correlation between farms in higher risk categories, as such farms could feasibly fail an ADF inspection based on non-conformance with factors unrelated to hygiene and consumer safety, whilst conforming with AHDH requirements.

The Union notes that dairy farms classified under the lowest risk category, Category 4, at their last AHDH inspection, and which have ADF status, will have their official inspection frequency significantly reduced. While Members welcomed the principle of adopting such an approach, some expressed concern that the proposed period of at least one on-farm inspection over a 10 year period for lowest risk dairy farms was too long, and did not provide adequate protection against changing circumstances.

The Union would support further, evidence based consideration being offered to the inspection frequency for higher risk category farms (Categories 1 and 2), and further analysis and review of the potential to extend these changes to Category 2 farms.

In conclusion, members were generally supportive of moves towards reducing the burden of inspection of dairy farms. However, given the concerns highlighted above, the Union would question the validity of comparing two schemes which, post evaluation, were shown to have fundamental differences in their primary function and their relative merits regarding the evaluation of on-farm dairy hygiene and categorisation of risk. The Union would therefore recommend a proper and thorough evaluation of the ADF scheme with a view to minimising onerous and unnecessary factors whilst allowing for the inclusion of factors which will increase the validity of this scheme in assessing the dairy hygiene standards.

I trust that due consideration will be given to the preceding information.

Yours

A handwritten signature in black ink, appearing to read 'Hazel Wright', written in a cursive style.

Dr Hazel Wright
Senior Policy Officer