



Food Standards Agency Consultation

**Revision of Guidance for Home
Slaughter of Livestock in England and
Wales**

**Response of the Chartered Institute of
Environmental Health (CIEH) in Wales**

October 2019

About the Chartered Institute of Environmental Health (CIEH)

The CIEH is the professional voice for environmental health representing some 8,000 members working in the public, private and non-profit sectors. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

For more information visit www.cieh.org and follow CIEH on Twitter @The_CIEH.

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This submission

In producing this submission, the CIEH has drawn on comments provided by its members. The CIEH is extremely grateful for their assistance.

Introduction

The CIEH is grateful for the opportunity to comment on the updated guidance 'Home Slaughter of Livestock – A guide to the law in England and Wales'.

The CIEH has members working across the UK to ensure food is safe and what it says it is. They work in the public, private and third sectors, delivering official controls, training food handlers and advising food businesses of their legal obligations. They all work with a common purpose –keeping consumers safe.

CIEH Response to FSA Consultation

The consultation seeks to establish whether:

- The guidance provides sufficient information to aid compliance with the law
- Best practice advice in the guidance is clearly identified?
- The guidance is clear and easy to follow?
- The assessment of the impact of the updates is sufficient

Does the guidance provide sufficient information to aid compliance with the law?

Generally, the guidance provides sufficient information to aid compliance with the law. However, the inclusion of the following information would further aid compliance:

- In paragraph 15 it states that 'SRM must be disposed of in an approved category 1 rendering or incineration plant'. It would be useful at this point to provide readers with a link to approved animal by product disposal sites (including SRM) or refer them to the link in Annex A.

- At paragraph 30 it would be beneficial to provide advice to livestock owners and enforcement officers on how they can verify that a slaughter man holds a certificate of competence or WATOK licence.
- Whilst it is acknowledged that the guidance relates to home slaughter, there are several references in the document to approved slaughterhouses. It would be useful to include in the document information for livestock owners on how they can find out the locations of approved slaughterhouses.
- The link in the document to local authorities is to food safety teams. As TSE regulations are enforced by Trading Standards, a suitable link should be provided to Trading Standards services.
- It would be useful if the guidance could provide local authorities with an indication of the nature and frequency of monitoring / verification activities that would be considered appropriate.

Is best practice advice in the guidance clearly identified?

The guidance clearly differentiates between legal requirements and best practice with best practice clearly highlighted in the document.

Is the guidance clear and easy to follow?

Generally, the guidance provides clear, easy to follow information for local authority enforcement officers, livestock owners and licensed slaughter men. The document could be further enhanced by including the titles of the annexes on the contents page as below:

Annex A	Useful Contacts
Annex B	Questions & Answers
Annex C	Definition of Specified Risk Materials

Is the assessment of the impacts of the updates sufficient?

The guidance clearly indicates that local authorities are responsible for the enforcement of Animal Welfare and the domestic Food Hygiene and Transmissible Spongiform Encephalopathies (TSE) Regulations on farm. The resources required to monitor and verify that notified home slaughter activity is being carried out in accordance with the guidance have not been considered. If monitoring and verification activities are not carried out, there is a high risk of unlawful activity taking place i.e. meat being supplied beyond immediate family who share the household or being removed to another premises for processing.

Other observations

- Our members have identified the need to raise awareness of the requirement for a WATOK Certificate of Competence amongst seasonal on farm poultry producers.
- As a general public health comment, home slaughter poses an increased risk to farmers and their immediate families of contracting TB as the meat will not be subject to the same level of inspection as that from approved slaughterhouses.
- There appears to be no justification for a review of the guidance in July 2020. Unless there is a change in the landscape e.g. legislative change, review 12 months following publication of the guidance would seem appropriate and consistent with the approach taken to reviewing other documents.

In conclusion the CIEH welcomes the revised guidance for livestock owners and regulators on the law relating to home slaughter. We have made some suggestions for amendment and observations which we trust the FSA will consider.