

Extension to the Review of Field Delivery of Animal Health Services in Scotland

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Executive Summary

Following the publication of the **Review of Field Delivery of Animal Health Services in Scotland** in January 2020 Scottish Ministers accepted the recommendations contained within the report including the creation of a Scottish Veterinary Service (SVS) with a broadened range of functions (Option 3). However, the process of implementation was understandably delayed by pressures arising from the COVID-19 pandemic. During this time there has been increasing clarity of the implications arising from EU exit which, at the time of the initial report, were only informed opinion.

The Programme for Government 2021-22, *A fairer, greener Scotland*, committed that “Alongside the highest environmental standards in our marine and rural economies, we will ensure the highest standards of animal health and welfare, including the creation of a new dedicated Scottish Veterinary Service within this Parliament, to ensure there are highly trained staff to provide Scotland with good animal health and food safety to meet all our needs across the public and private sector for animal health issues”.

Scottish Government commissioned a limited extension to the previous review to consider whether the developments since publication and the proposed reach of the manifesto commitment, might result in fundamental changes to the existing recommendations including the modification of Option 3 to encompass food safety and marine animals.

Whilst recognising that arrangements following EU exit still needed to be finalised in some areas, notably trade with Northern Ireland and import checks, there was an increased comprehension of the impacts of this transition. These were consistent with the concerns expressed in the 2020 report although the degree of impact is now better understood.

The COVID-19 pandemic has seen marked changes to working practices and management approaches. Whilst many of these are short term changes some practices including hybrid working and an increased use of remote meetings and training are here to stay and need to be considered when designing the working practices of the SVS.

The suggestion to broaden the scope of SVS responsibilities to include food safety and marine animals was positively received. Such an approach was considered to provide improved industry and rural community support. Benefits including consistency of operational delivery, enforcement, training, communication and data capture and processing were recognised. Enhanced career opportunities and disease response capability were also considered positive outcomes. Some concerns were expressed regarding the impact of change on morale with the potential to lose staff and also the possible increase in cost as functions that are currently not being delivered are captured. The need to conserve current good practice was identified.

There was also broad agreement that animal welfare enforcement of the food producing species should form part of the remit of this organisation, and that the current position of separating health and welfare responsibilities is not optimal.

In conclusion a modified Option 3, an integrated bespoke SVS, was the preferred model which was considered to best meet Scotland's operational delivery needs.

The following recommendations are based on the results of the extension to the 2020 review and should be considered alongside the recommendations contained within that report:-

Recommendation 1 – the recommendations of the 2020 review remain valid and subject to the addition of the recommendations below there are no fundamental reasons to modify these.

Recommendation 2 – consideration should be given to the following activities being delivered by the SVS:

- terrestrial and aquatic animal health
- bee health
- food safety including meat inspection, wild and farmed fish certification and shellfish monitoring and area closures
- welfare enforcement of food production animals
- import checks including border inspection post operations

Recommendation 3 – a steering group should be formed, including representation from the organisations affected, to finalise the design of the SVS and to manage the transition until vesting.

Recommendation 4 – consideration of the developing landscape in trade with Northern Ireland, and imports in general, will be necessary in taking this work forward.

Recommendation 5 – changes to working practices resulting from the COVID-19 pandemic and arrangements to mitigate the impact of future events should inform the structural and operational design of the new body.

Recommendation 6 – participating organisations will need to put in place interim arrangements to manage the consequences of EU exit until the SVS is operational.

Recommendation 7 – an effective communication strategy will need to be implemented to communicate the benefits of change and to keep all organisations updated with progress.

1 - Introduction

1.1 The 2020 review of the field delivery of animal health services in Scotland made recommendations pertaining to future delivery which were accepted by Ministers at the time. This extension is not intended to repeat the analysis of the previous review but aims to evaluate the impact of developments since the report was published, notably EU exit and the COVID-19 pandemic. The implications of the manifesto commitments made by the current Scottish Government during the 2021 election campaign are also considered.

1.2 The terms of reference for this extension were developed by Scottish Government and can be found in full in Annex 1.

1.3 The review methodology was based on desk-based analysis and face to face interviews. This was supplemented by written evidence provided by several organisations. A record of the participating organisations and individuals is recorded in Annex 2.

1.4 I am grateful to all who contributed to this work and for the support provided by Scottish Government and the secretariat.

2 – EU Exit

2.1 The 2020 review highlighted the potential impact of EU exit on trade with the EU and third countries and, by implication, the increase in volumes of export health certification. Trade with Northern Ireland was highlighted as a potential issue with the resulting impact on Scottish ports. Recruitment of EU personnel, particularly veterinary staff to work in abattoirs, was also predicted.

2.2 It is over 18 months since the end of the transition period. The predicted increase in Export Health Certification has had a greater impact than expected particularly on the FSS notwithstanding that trade in meat and meat products is significantly below pre-EU exit levels. The required veterinary input into fish certification will require access to additional veterinary and technical resources.

2,3 Whilst the majority of certification is undertaken by private practitioners this adds cost impacting on competitiveness. In remote areas, with small veterinary practices, availability can be constrained particularly if there is a competing urgent animal health matter. The consequential risk is that the government becomes the default provider.

2.4 Arrangements for trade with Northern Ireland have still to be finalised and there is uncertainty relating to the checks that will be required at ports such as Cairnryan. Implications of the impact of this work will need to be taken into account by the project team in developing the SVS.

2.5 To date there have been a limited number of trade deals completed which collectively account for a very small percentage of total trade in animals and animal products. Consequently, there is uncertainty regarding the resources required to

meet this commitment. Organisations consulted commented that trade deals are likely to be 'paper heavy' and that robust surveillance will be required to underpin disease status and maintain confidence of trading partners. The SVS with a broad range of responsibilities was seen as a mechanism to ensure consistency of data collection, management and interpretation.

2.6 Recruitment of veterinary and technical staff is, as expected, an issue currently impacting predominantly on the work of the FSS and fish industry. APHA are managing to recruit effectively albeit with difficulties in some geographical areas. Whilst recruitment of veterinary staff is a significant issue, inspectors and other workers are also affected. There are also wider industry problems with sourcing enough staff which is impacting on production and animal welfare.

2.7 Other issues highlighted include:

- a lack of clarity of the impact of import inspection requirements. These have been delayed until July 2022. Plants and bees account for more imports than animals, however, large volumes of animal products are imported
- kennelling capacity for imported dogs inadequate and requires further investment
- BIP work increasing markedly which will have resource implications
- export of salmon now taking two rather than one day
- reduced access to EU training courses

3 - COVID-19 Pandemic

3.1 The COVID-19 pandemic was not foreseen in the 2020 review. It has had a wide impact across society and has resulted in considerable disruption and change to working practices. Whilst many of these changes will be transitory some will be longer lasting or permanent and these will need to be considered in the development of the SVS.

3.2 The requirements for isolation and home working have had a significant impact on operational delivery across the organisations consulted. Whilst most undertook some visits and inspections following appropriate risk assessment, some did not. This has resulted in backlogs of licencing and inspection work that will take up to 18 months to address.

3.3 Home working has been universally utilised and many foresee this becoming a normal part of future working practice although there was recognition that there needs to be a significant improvement in technology and internet access for this to be fully effective.

3.4 Several organisations commented that some visits are no longer seen as the first resort and some issues can be resolved remotely including post mortems and instructions for the taking of samples. Risk analysis and data checks can inform a reduced reliance on visits. On the downside, a lack of presence on site led to reduced familiarity, opportunities for training and dealing with side issues.

3.5 APHA reported that they had successfully managed small disease outbreaks remotely but recognised that in a large emergency this would be a bigger challenge and that remote management did not optimise training and made the recognition and management of the mental health of staff difficult. Another positive was that staff could undertake longer rotations whilst working from home when compared to being on detached duty.

3.6 Remote working was also seen to provide increased career opportunities for those individuals in remote areas who have commitments that do not allow them to relocate for career advancement.

3.7 Distance learning was also observed to be more inclusive being more time and cost efficient. This had led to a broadening of expertise of Environmental Health Officers. However, it was recognised that not spending time as a team in the office led to a decrease in learning by ‘osmosis’ from experienced colleagues.

3.8 Other issues that were raised relating to the impact of COVID-19 included:

- inconsistent working practices within and between organisations. This needs to be improved for future incidents of this nature
- a considerable backlog of cases before the courts which reinforces the need for a wider and better suite of enforcement tools
- lockdown resulted in animal welfare problems being experienced as single farmers could not get help from friends and family for routine work as well as emergencies

3.9 There was consensus that a single operational delivery body would have been more resilient and could have maximised the management of the challenges experienced and the resources available.

4 - Scope of the Proposed Scottish Veterinary Service

4.1 During the 2020 review there was enthusiasm for a wider integration of animal health, public health, aquatic and bee health operational services into a single body (Option 3) resulting in Recommendation 2 - *the transition to a separate SVS provides an opportunity to deliver efficiencies and enhanced service excellence through the formation of a bespoke delivery body with a wider range of functions than that currently delivered by APHA in Scotland. Additional areas for consideration could include, but not be limited to; meat hygiene inspection, animal feed controls, scanning surveillance, aquatic disease control, bee health as well as a greater clarity and responsibility for farmed animal health and welfare enforcement.* This was accepted by Ministers at the time.

4.2 The Programme for Government 2021-22, *A fairer, greener Scotland*, committed that “Alongside the highest environmental standards in our marine and rural economies, we will ensure the highest standards of animal health and welfare, including the creation of a new dedicated Scottish Veterinary Service within this Parliament, to ensure there are highly trained staff to provide Scotland with good animal health and food safety to meet all our needs across the public and private

sector for animal health issues. This is not inconsistent with the recommendation above but demonstrates an evolution of the concept of an SVS to be a comprehensive operational delivery service.

4.3 This extension considers refinement of Option 3, a new bespoke SVS, to align with the manifesto commitment above.

4.4 Contributors to this extension work were broadly in agreement that Scotland would benefit from a fully integrated service which should include terrestrial and aquatic animal and public health and animal welfare. This would deliver a joined up and improved 'One health' approach. The current separation of responsibilities for farmed fish health and welfare was not considered to be helpful. Fish are not currently covered by the Veterinary Surgeons Act which was widely seen as a weakness that needed to be address when the Act was next updated.

4.5 The public health element should include meat inspection, shellfish monitoring and area closure management, and the oversight and delivery of export health certification. Consideration of the involvement of private veterinary practitioners as highlighted by the 2020 review should also be considered. Contributors thought that this would provide better coordination and efficiency as well as providing the opportunity for a much needed joined up IT system. Concern was expressed of the impact on morale with the consequential potential for staff losses and also the possibility of increased cost as functions not currently delivered are captured.

4.6 Some contributors expressed concern that the development of the SVS should not impact on the existing links between science, policy and operations. That there needs to be effective communications and IT and that care should be taken that areas that currently work well are not adversely impacted by the change. Naturally there was reluctance by some individuals to undergo change but the predominant view was that not only was this the right thing to do but the timing, in light of the significant impact of EU exit and COVID-19, was fortuitous.

4.7 The consensus was that food producing animal welfare enforcement would benefit by consolidation within the SVS, not least due to the impression that current arrangements lead to a post code lottery for enforcement. However, Local Authorities were reluctant to lose this function and concerned of the wider impact such a change might have on morale and the other animal health services that they deliver. This change would not impact on the scope of the SSPCA although clearly relationships would change.

5 - Staff Resources

5.1 Staffing requirements for the SVS can only be determined when the scope of the organisation has been finalised. However, it is evident that the significant trade impacts of EU exit will require additional staff. This resource can be most efficiently sourced through an integrated delivery body which can ensure consistency of delivery and training allowing greater flexibility of delivery.

5.2 Current staffing complements are deemed to be adequate for existing workloads, although vacancies exist due to recruitment difficulties following a reliance on recruitment from the EU, as well as difficulty filling posts in some geographical areas. FSS meat hygiene controls are the most challenged in this respect although accessing expertise in fish medicine is also an issue.

5.3 An integrated SVS is likely to be a more attractive employer, provide improved job satisfaction and greater career opportunities.

5.4 Reliance on private veterinary practitioners in remote areas was repeatedly raised as a potential risk. Industry requires rapid access to certification and there is a concern that with the small number of veterinarians in remote areas, and competing animal health priorities this may not be fully met resulting in the SVS becoming the default provider. The 2020 review recognised this issue as well as the risks to surveillance and recommended that as part of the transition process consideration should be given as to how this could be managed.

6 - Other Issues Raised

6.1 The 2020 report recognised the importance of connectivity between the SVS, policy and science. This was raised as a concern in relation to fish health during this work. It will be important in delivering the transition that suitable arrangements are put in place across the range of activities undertaken by the SVS to maintain appropriate connectivity and data sharing.

6.2 Local Authority representatives were positive about the impact of the Animal Health and Welfare Framework document which they considered had been beneficial in identifying roles and responsibilities and facilitating effective communication. A similar approach may be of value in defining relationships with the SVS.

6.3 Several organisations commented that an integrated SVS would have access to the resources and expertise required to respond to significant events and emergencies to the benefit of all interests. However, one individual expressed concern that a response to a food safety emergency may be prioritised over animal health issues, although also recognised that this could be effectively managed through structural design.

6.4 A common theme was the importance of livestock and fish production in underpinning the rural economy, particularly in remote areas, where a large number of sustainable and high-quality jobs were dependant on the success of these enterprises. The SVS was seen as having a major role in underpinning these businesses through its delivery of animal health and welfare, surveillance and support for internal and international trade.

6.5 Cost recovery was raised by some organisations as a potential mechanism of funding the SVS. This will need to be considered in line with wider government policy and the impact of the acceptability of this approach in a new organisation.

7 - Conclusion and Recommendations

7.1 Livestock and fish (particularly salmon) farming are important contributors to the rural economy and provide high quality and sustainable jobs often in remote areas. Effective protection and enforcement of animal and public health, animal welfare and the facilitation of trade are important services which underpins the viability and sustainability of this industry.

7.2 The majority of consultees supported the concept of the SVS commenting that rationalising animal and public health operations across terrestrial and marine food producing animals was the correct solution for Scotland. An SVS would provide the opportunity to focus on Scottish issues, streamline delivery, build synergies, deliver efficiencies, enhance surveillance and standardise training. Robust standards and accreditation would underpin the quality of work and provide confidence to trade partners. Some individuals expressed the importance of protecting current good practice and of maintaining existing links between science, policy and operations when designing the SVS.

7.3 The inclusion of public health elements of animal and fish production (including meat inspection, shellfish biotoxin monitoring and area closures, inspection and certification) were seen to deliver a comprehensive and coherent farm to fork approach. An integrated service also provides opportunities for consistency, career opportunity and flexibility. Coordinating operational services in this manner would also strengthen surveillance, communication and controls thereby enhancing Scotland's reputation with trading partners.

7.4 There was also broad agreement that animal welfare enforcement of the food producing species should form part of the remit of this organisation and that the current position of separating health and welfare responsibilities was not optimal.

7.5 In conclusion a modified Option 3, an integrated bespoke SVS, was the preferred model which was considered to best meet Scotland's operational delivery needs and would be efficient, flexible and cost effective.

7.6 The following recommendations are based on the results of the extension to the 2020 review and should be considered alongside the recommendations contained within that report:

Recommendation 1 – the recommendations of the 2020 review remain valid and subject to the addition of the recommendations below there are no fundamental reasons to modify these.

Recommendation 2 – consideration should be given to the following activities being delivered by the SVS:

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Recommendation 3 – a steering group should be formed, including representation from the organisations affected, to finalise the design of the SVS and to manage the transition until vesting.

Recommendation 4 – consideration of the developing landscape in trade with Northern Ireland, and imports in general, will be necessary in taking this work forward.

Recommendation 5 – changes to working practices resulting from the COVID-19 pandemic and arrangements to mitigate the impact of future events should inform the structural and operational design of the new body.

Recommendation 6 – participating organisations will need to put in place interim arrangements to manage the consequences of EU exit until the SVS is operational.

Recommendation 7 – an effective communication strategy will need to be implemented to communicate the benefits of change and to keep all organisations updated with progress.

Annexes

Annex 1 - Extension to the Review of Field Delivery of Animal Health Services in Scotland

Terms of Reference:

Background

1. This project will build upon the previous work undertaken in 2019-20 in reviewing the field delivery of animal health and welfare services currently provided by the Animal and Plant Health Agency (APHA) in Scotland.
2. This work resulted in the publication of your report entitled [*Review of Field Delivery of Animal Health Services in Scotland*](#) (herein referred to as “the report”).
3. It is almost 2 years since the initial report reviewing field veterinary services in Scotland was written. Although many of the EU Exit predictions in the report have materialised, there are new problems that have since come to light. There are also many changes that have taken place in response to the challenges living with and responding to COVID-19, which was unforeseen by the review.
4. Furthermore, the SNP Manifesto published a commitment that went beyond the remit of the initial review in 2019, i.e. “create a new Scottish veterinary service to ensure that we have enough people with the right qualifications in veterinary services, animal health and food safety to meet all our needs across the public and private sector for land and marine based animal health issues”.
5. We require you to revisit the report and consider whether there are any fundamental changes to the recommendations or amendments/additions to the initial recommendations, which include additional requirements and controls placed on APHA as a result of EU Exit (as well as Scotland’s veterinary services, by that process), and the proposed extended reach of the SNP Manifesto commitment. For clarity, the main areas to focus on are the additional inclusion of “food safety” and “marine based animal health issues”.

Aim

6. This extension of the review will consider the consequences of the additional services (referenced above), and how they can be integrated within the Scottish Veterinary Service (SVS). This work, like the original review of field delivery of animal health services in Scotland will:
 - Identify advantages and disadvantages of each option.
7. The reviewer may also identify activities and operations by APHA (other than the Scottish APHA Field Services), or other organisations, such as Marine Scotland (MS) and Food Standards Scotland (FSS), in the field of animal

health and veterinary controls, which may also be considered for delivery by a Scottish Veterinary Service.

Objectives

8. The research objectives for this project are to:
 - Assess the implications and identify the pros and cons of integrating marine based animal health issues and food safety aspects into the structure of the proposed Scottish Veterinary Service.
 - Review whether existing staff numbers are adequate in order to deliver an efficient and resilient service.
 - Review the impact of EU Exit on the services delivered by the Scottish Veterinary Service.
 - Provide recommendations for the future delivery of animal health and welfare field services in Scotland delivered by the Animal and Plant Health Agency (APHA), Marine Scotland and Food Standards Scotland.

Methods

9. Due to COVID-19 restrictions, physical in-person meetings should only be held if there is a strict business need. It is expected that whilst these recommendations are in place for Scottish Government staff, these should also be followed by anyone contracted to work for the Scottish Government. Alternatives, such as desk-based interviews undertaken on Microsoft Teams, would be preferred for both your own wellbeing as well as the potential interviewees.
10. Methods may include surveys of users and/or providers of the current services, and analyses of animal health risks, environmental risks, economics, market forces and new technological solutions.

Research Outputs

11. The successful candidate will provide the Scottish Government with the following outputs:
 - An oral presentation of their research findings (potentially virtually, via MS Teams) to the Scottish Government by 27 September 2021.
 - A first draft of the report, which should contain an executive summary, in a format compatible with Microsoft Word by 08 October 2021.
 - A final report, which should contain an executive summary in a format compatible with Microsoft Word by 18 October, 2021.
 - The final report should provide recommendations for the Scottish Government regarding the delivery of Scottish veterinary field services, in line with the aim and objectives of the project.

Annex 2 – List of Organisations and Individuals Interviewed

Animal and Plant Health Agency (APHA)
Food Standards Scotland (FSS)
Local Authorities
Marine Scotland (MS)
Ronnie Soutar – fish veterinarian
Scottish Government



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