

JANUARY 2019

NEW RED TRACTOR INSPECTION REALLY DOES HAVE TEETH!!

T Red Tractor announced last September the introduction of “Risk Based Inspections” and a Newsletter was sent out to all producer members reminding them about the importance of 365-day compliance.

A The major change here was to introduce a grading system (decision matrix) based on the nature and number of non-conformances found at the routine inspection. “Poor performers” exceeding an as-yet unknown threshold, are then subject to an increased inspection frequency – usually in the first instance this appears to constitute an un-announced “spot-check” for which the producer must pay.

L The purpose of this newsletter is to alert our producers to the reality of the new inspection regime, the impact it has already had on some of our clients, and common problems/non-conformances that really do now need to be avoided. The background to the new inspection regime appears to relate to increased scrutiny of the pig sector (in part related to increased Animal Rights activity) and questions being voiced in some quarters over the robustness of the scheme.

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S Since implementation of the new risk based regime, and an apparent harder stance in terms of enforcement, non-conformances have been issued to several of our clients in relation to :-

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1. **Farm Map.** A farm map must be in place and it must show several things including biosecure areas, watercourses, bait points, designated areas for smoking and food consumption etc.
 2. **Disaster recovery/Emergency Plan.** A documented plan must be in place detailing contingencies to avert welfare problems in case of various potential emergencies including movement restrictions, extreme weather, disease outbreak, etc.
 3. **Visitor records.** Must additionally contain a declaration that each visitor has not been suffering from vomiting or diarrhoea in the past 48 hours.
 4. **Teeth Reduction.** All husbandry tasks are now very much under scrutiny. Specific N.C’s in relation to teeth reduction have included “short” clipping – RT Standard states that “a smooth intact surface must be left and that the pulp cavity is not exposed”. Decisions to reduce teeth must be made at an individual batch/litter level and this needs to be outlined in your VHP. Bearing in mind the new stance on enforcement here, and other potential benefits, some producers are now switching to teeth reduction by grinding as opposed to clipping. This is very quick, relatively safe/stress-free for both people and pigs and appears equally effective. Specialist equipment is available from East Riding Farm Services (Dremmel with specialist guarded grinding head) amongst other suppliers. <http://www.erfs.co.uk/images/erfs-brochure.pdf> . Product Catalogue, page 33, no. 14. This is a good option to look at.
 5. **Training Records.** This is unfortunately an area of real confusion as training requirements are mentioned in several different standards, with slightly different requirements in the different standards. Unless very careful there is significant for producers scope to find themselves on the receiving end of a non-conformance. Records of all staff trained and deemed competent by the vet to administer injections, perform pig euthanasia of different classes of stock inspections, dock tails and reduce teeth must be made in the units VHP. Husbandry procedures are only carried out by competent persons in accordance with scheme requirements and only when necessary. Producers have received N.C’s where new unit staff,

not yet having received vet training or assessment, have been found to be performing husbandry tasks. Other standards additionally require a Staff Training Record to be maintained detailing quite a lot of information including name, start date, training given, by whom, date of training, date of annual review, etc.

6. **eMB Records.** Some producers are still unfortunately not getting their antibiotic usage onto eMB in the correct time frame- within 6 weeks of the end of the quarter. NB. Returns for quarter 4 2018 are now due.
7. **Presence of an up-to-date VHP.** Absence of a current Health Plan is a straight NC and should be relatively easy to avoid.

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In busy “Vet” or “Farming” lives it is very easy to ask the question “Well, so what?” Well as stated at the outset, the new approach has resulted in several of our producers being awarded an unannounced spot check, and therefore being charged £400 for the privilege. We are also hearing that annual audits are taking much longer than previously - 6¼ hours in one recent case.

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Red Tractor and the certification bodies do appear to have reacted to recent criticism by beefing up both standards and enforcement. That is possibly fine if it is applied consistently but we are aware of cases where standards have not been applied consistently in exactly the same situations. One typical example here is what you might consider a relatively minor non-conformance for not having a “Vomiting and Diarrhoea” declaration on the Visitor Record resulting in no further action on one form, whilst on another it has created a non-conformance. RT are telling us that NC’s identified at a visit should always be listed as NC’s even if they have been completely resolved during the visit – usually by minor amendments to paperwork. This is quite sapping in terms of confidence. To date Red Tractor have also been unwilling to share details of exactly what triggers the award of a “spot-check” including classification of non-conformances into “major” or “minor” categories and, the number of any such NC’s that might exceed their threshold for triggering the spot check.

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This really has become something of a minefield! We at the George will continue to do our best to guide you through it all but, many of these things do require your active effort too. Forward planning ahead of your annual audit can obviously be helpful but please try to avoid last minute phone calls to Angie and her team in the office.

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I’m sorry to be bringing you relatively sober news but we have a responsibility to keep our clients informed and protect them if we can. You do have a right as a producer to challenge any NC’s issued at the time of annual audit – particularly at the “wash-up” meeting, usually before the inspector leaves. Beware that if you just sign the form presented to you at this stage you are effectively signing that you agree with any NC’s that might have been listed and it is then much harder to subsequently challenge them. Red Tractor are aware of our concerns regarding the new approach and we will seek to maintain dialogue. Red Tractor needs farmers and farmers need Red Tractor so ultimately we have to hope some sense will prevail. Please let us know if you feel you have been unfairly dealt with so that we can feed this into our discussions with Red Tractor.

Thanks and “don’t shoot the messenger”

Richard B Pearson BVSc MRCVS