

Submitted to Consultation on the classification and price reporting of sheep carcasses and the authorisation of automated grading methods for the classification of sheep and beef carcasses.  
Submitted on 2024-03-11 14:23:58

Why we are consulting

Overview

How are we proposing to make changes?

About you

1 Are you, or do you represent:

other (please specify)

If other, please specify::  
Non-departmental public body

2 Please provide the name of the business or organisation that your responses represent:

Please provide the name of the business or organisation that your responses represent::  
Agriculture and Horticulture Development Board (AHDB)

3 Please indicate where your business/organisation operates:

Other (please specify)

If other, please specify::  
HDB is a statutory levy board funded by farmers and others in the supply chain. Its purpose is to be a critical enabler, to positively influence outcomes, allowing farmers and others in the supply chain to be competitive, successful and share good practice. It equips levy payers with easy-to-use products, tools and services to help them make informed decisions and improve business performance. Established in 2008 and classified as a Non-Departmental Public Body (NDPB), AHDB supports the following industries: meat and livestock (Beef, Lamb and Pork) in England; Dairy in Great Britain; and Cereals and Oilseeds in the UK

4 If you represent an abattoir(s), please indicate the number of premises you have in each country?

England:

Wales:

Scotland:

Northern Ireland:

Other (Please Specify):  
n/a

5 If you represent an abattoir, please select the proportion of your total sheepmeat production that is supplied to the export market?

Not Answered

6 If you represent abattoir/s, please provide your average weekly throughput over the last 12 months.

Sheep - Less Than 12 Months Old:

Sheep - 12 Months Or Older:

Cattle - Aged From 8 Months:

Other (Please Specify):  
n/a

Confidentiality

7 Would you like anything in your response to be kept confidential?

No

Please provide your reasons for requesting confidentiality for all or part of your response to this consultation.:

## Proposal 1: Abattoir throughputs

8 Do you agree or disagree that abattoirs in England and Wales slaughtering 2000 or more sheep per week, on a rolling average basis, should have to meet the scheme's requirements to carcase classify and deadweight price report sheep that are less than 12 months old at slaughter?

Neither Agree nor Disagree

If you wish, please provide comments to support your answer.:

The potential benefits of mandatory sheep classification occur at two levels: Industry wide – mandatory sheep classification would provide greater potential for monitoring trends in carcase quality nationally which helps inform industry development, knowledge exchange and research activity. If coupled with individual recording against an identity that can be linked to pedigree, the data could be used to provide national genetic evaluations for carcase characteristics in the longer term. This approach has been used to deliver carcase traits Estimated Breeding Values (EBVs) for dairy and beef cattle. Commercial transactional level – mandatory classification, with the associated elements of standard dressing specification and weighing, enables a fair comparison of the price being offered by different processors for sheep and thus providing transparency. This would provide stronger market signals for those carcasses that better fit the supply chain needs and lead to improved supply chain efficiency. The throughput level for mandating classification is a matter for Government and commercial operators, so long as the threshold delivers a sample of classification data that is representative, then the needs for monitoring industry trends and price reporting are met. An important consideration throughout this consultation is the ability to age sheep to the proposed 12-month definition, to ensure consistent application to classification and price reporting needs. AHDB believes the requirement to report should be based on clean sheep with no permanent incisor teeth erupted. If the dentistry definition changes at a future point to define a clean sheep's age (for example, through utilising a cut off date) then any proposed regulation needs to recognise this point.

9 Do you agree or disagree that abattoirs slaughtering between 1000 and 1999 sheep per week, on a rolling average basis, should have a choice to opt-in to the scheme?

Neither Agree nor Disagree

If you wish, please provide comments to support your answer.:

The lower limit for the choice to opt-in should be based on evidence related to the desire of plants to opt in, balanced against the cost of administering and supervising these plants. A lower limit (of say 500/week) could be considered.

10 Please provide any further comments you wish to make on Proposal 1:

Please provide any further comments you wish to make on Proposal 1::

## Proposal 2: Classification scale

11 Do you agree or disagree with Proposal 2 (set out above) on classifying carcasses to the (S)EUROP grid?

Neither Agree Nor Disagree

If you wish, please provide comments to support your answer.:

The (S)EUROP grid is largely understood by producers and through mandatory classification, offers an effective method of communication to the industry. It also provides a guide to the ability of a carcase to yield saleable meat. There is the future potential to incorporate other measures alongside it, for example assessments related to eating quality. Initially this is likely to be on a voluntary basis, although there would be the scope to introduce an amendment to the mandatory scheme. In terms of clarity, if use of the "S" class is part of the mandatory scheme, it would be clearer to refer to the scale as the SEUROP scale (without parentheses, as these suggest some optionality). Further consideration would also need to be given to the price reporting mechanisms if SEUROP was to be adopted.

## Proposal 3: Licencing

12 Do you agree or disagree with proposal 3 (set out above) for the licencing of carcase classifiers?

Neither Agree nor Disagree

If you wish, please provide comments to support your answer.:

13 Do you employ people that will require a licence under a mandatory sheep scheme to classify sheep carcasses?

No

14 If yes, how many people will require a license?

Not Answered

## Proposal 4: Carcase presentation and weighing

15 Do you agree or disagree with proposal 4 (above) which sets out the carcase presentations to be used at classification?

Neither Agree nor Disagree

If you wish, please provide comments to support your answer.:

We agree with the principle of defined dressing specifications, but the suitability of the specific dressing specifications is not for us to comment on.

## Proposal 5: Weighing the carcase and the warm to cold weight coefficient

16 Do you agree or disagree that weights should be measured and recorded to the nearest 100g?

Strongly Agree

If you wish, please provide comments to support your answer.:

17 Do you agree or disagree with the application of a 2% warm to cold weight coefficient?

Agree

If you wish, please provide comments to support your answer.:

## Proposal 6: Reporting of classification grades and prices

18 Do you agree or disagree with Proposal 6 (above) on information reporting?

Strongly Agree

If you wish, please provide comments to support your answer.:

Transparency would be improved further by requiring all deductions made from the price paid by the abattoir to the producer, or charges for additional services that may be provided where charged, to be separately detailed, on the information provided to the supplier: ☐ Transport ☐ Washing vehicles ☐ Ante-mortem inspection charge ☐ Cleaning dirty animals or trimming ☐ Classification ☐ Meat hygiene inspection ☐ Residue testing ☐ Rejection insurance ☐ Specified Risk Material (SRM) or other disposal charges ☐ Statutory levies (these should be standard but there have been cases of variation in the charges back to producers) ☐ Bad debt 'levy'

19 Do you agree or disagree that abattoirs should be required to complete their data and price reporting to government using an electronic format?

Strongly Agree

20 If your business will be required under these proposals to report pricing information in an electronic format, can you already meet this requirement?

N/A

If you have responded no or don't know please give your reason.:

21 If you need to make changes to your systems to enable you to report prices electronically - please estimate how much this will cost and details of what you will need to do.

Estimation:

n/a

## Proposal 7: Coefficient applied to align the dressing specification on reported prices

22 Do you agree or disagree with proposal 7?

Neither Agree nor Disagree

If you wish, please provide comments to support your answer.:

The coefficients have been selected based on objective data and are a compromise between accuracy and the ability to understand the adjustments being made by the wider industry. Given adjustments to the AHDB's deadweight sheep methodology in November 2023 to improve accuracy while reflecting industry direction, the AHDB would suggest any further adjustments to the proposed application of coefficients would need careful consideration and very clear communication to industry.

## Proposal 8: Data Publication

23 Do you agree or disagree with Proposal 8 (above) on the publication of data?

Agree

If you wish, please provide comments to support your answer.:

AHDB observes that unlike all other red meat sectors, a significant percentage of the total lamb kill is sold on a liveweight basis (55% of total sales in 2020/1). Given the interests of this consultation, AHDB would suggest that the agricultural industry consider the long-term requirements of the sector and as such, whether similar price reporting powers are needed in, and could be administered in, the live weight sector to deliver certainty regarding transparent, accurate data in the long term.

24 Would you prefer that collated price data is published on pence/kg basis for 'all lambs' slaughtered deadweight or for those slaughtered deadweight meeting the Standard Quality Quotation 'SQQ'?

Not Answered

If other, please specify::

If you wish, please give the reason for your selection?:

Having the capability to report an 'all' price alongside an SQQ price would deliver additional data to the marketplace, enabling levy payers to utilise the information that most accurately reflects the intended use.

## Proposal 9: Monitoring and enforcement

25 Do you agree or disagree with our Proposal 9, covering the offences, powers of entry and inspections to be used to monitor and enforce the regulations for the sheep carcase classification and price reporting?

Neither Agree nor Disagree

If you wish, please comment on your selection.:

## Proposal 10: Automated grading methods

26 Do you agree or disagree with Proposal 10, on providing for the authorisation automated sheep grading methods?

Disagree

If you wish, please provide comments to support your answer.:

The current proposal for data collection followed by a robust approval process split over the year to reflect seasonal change will result in those currently using VIA being unable to do so for an extended period of at least 18 months, if not longer. Given VIA is operating in some sites currently, we would encourage DEFRA to work with industry to explore the opportunity to harness existing data and consider how the data collection and the approval process can be expedited while meeting the necessary robustness tests.

27 Do(es) the business(es) that you are representing operate an automated grading method for classifying the carcasses of sheep?

No

28 If you answered yes to question 27 has it been authorised for use in another country?

Not Answered

Please name the Country/ies.:

29 If your business uses automated carcase classification, please provide details of the number of manual classifiers used on that/those line(s).

Not Answered

30 If you were unable to use the automated carcase classification technology of that/those lines, please estimate the number of manual classifiers would you need to replace the automated grading technology.

Not Answered

31 If your business is using automated grading currently, please provide evidence of the impact of the requirement to use licensed manual carcase classifiers, for a period whilst appropriate sheep classification data is collected, will have on your business.

Please provide evidence below.:

## Proposal 11: Process for authorising automated grading methods for sheep and beef

32 Do you agree or disagree with Proposal 11 above, which sets out the process for authorising automated sheep and beef grading methods?

Neither Agree nor Disagree

33 Are there any steps in Proposal 11 that you think should be changed?

Not Answered

If yes, please state which step and provide comments to support your answer.:

#### Proposal 12: Methodology of test

34 Do you agree or disagree with Proposal 12 above, on the methodology to be used to test automated sheep grading methods?

Neither Agree nor Disagree

If you wish, please provide comments to support you answer.:

Following the beef model for approval makes sense as it is known to work and is familiar to the sector.

35 Are you content that authorisations granted by government are listed, with the terms of authorisation, on Gov.UK?

Not Applicable

If you have any further comments on the authorisation process being proposed, please make them here.:

#### Proposal 13: Sheep specific issues for automated grading methods

36 Do you agree or disagree that automated grading methods must be capable of classifying carcasses from new season lamb and old season lamb?

Agree

If you wish, please comment on the reason for your selection :

37 Do you agree or disagree with Proposal 13 (above), that a minimum of 600 representative sheep carcasses are tested?

Agree

If you wish, please comment on the reason for your selection :

38 Do you have any alternative suggestions how the accuracy and reliability of the automated grading method can be ensured/tested when classifying carcasses of lambs year-round? If so, please comment below.

Please answer below.:

#### Proposal 14: Hanging presentation

39 If you operate or intend to operate automated grading equipment in the next 5 years, please can you:

For example-cross legged, straight legged, banded shoulder, unbanded shoulder, legs together, legs apart, other-please specify, N/A:

For example -gambrel, hook, J-hook, A-frame (size and width).:

For example an approximate cost of changing from gambrels to hooks or vice versa.:

For example an approximate cost of changing from gambrels to hooks or an additional person to cross the legs after the scale.: