



Department  
for Environment  
Food & Rural Affairs

# Fairness in the supply chain: Consultation on changes to carcase classification and price reporting by abattoirs in England

May 2018



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[www.gov.uk/defra](http://www.gov.uk/defra)

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# 1. Introduction

In response to the Groceries Code Adjudicator (GCA) Call for Evidence that closed on 10 January 2017<sup>1</sup>, the government announced that it would consult on introducing measures to improve fairness and price transparency for producers in the livestock sector.

This consultation proposes to mandate the use of a carcase classification and price reporting system for sheep in England. This would require abattoirs to use a standard grid to classify sheep carcasses for the purposes of calculating the price paid to the producer. Classification will need to be undertaken by a qualified assessor. Producers will see the results of the classification process. This will help ensure that producers receive consistent information on the classification of their animals, and are paid per animal in a transparent manner. Licensing of classifiers and monitoring in abattoirs would be carried out by the Rural Payments Agency.

Under EU rules, carcase classification has been mandatory in commercial-scale abattoirs in the beef sector for some time. However, for sheep, classification is non-mandatory and to date has not been introduced.

This consultation will also seek views on a requirement for abattoirs to publish schedules of charges and prices for all livestock sectors (beef, pigs and sheep).

This consultation is for England. The Scottish Government has already consulted and the outcome is available online<sup>2</sup>. The Welsh Government is running a parallel consultation, available here: <https://beta.gov.wales/consultations>. Northern Ireland Executive Officials are considering consulting.

## Acronyms

AHDB – Agriculture and Horticulture Development Board

CMO – Common Market Organisation

GCA – Groceries Code Adjudicator

RPA – Rural Payments Agency

VIA – Visual Imaging Analysis

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<sup>1</sup> The consultation outcome was published on the 16<sup>th</sup> February 2018:

<https://www.gov.uk/government/consultations/groceries-code-adjudicator-extending-its-remit>

<sup>2</sup> The Scottish consultation and it's results are available here: <https://consult.gov.scot/livestock-policy/mandatory-sheep-car carcass-classification/>

## 2. Purpose of the consultation

The purpose of this consultation is to seek your views on the introduction of mandatory sheep carcase classification in England, and the form that should take.

It also seeks views on publishing schedules and prices in all livestock sectors.

### Who will be affected by this proposal?

This consultation is directed at anyone principally with an interest in the regulation of the sheep sector. It will be of particular interest to you if you are;

- engaged in activities associated with the production, sale, or processing of sheep; or
- engaged in activities for the benefit of the sheep industry.

**In addition, the section entitled “Publication of schedule of charges and prices” applies to the beef and pig sector.**

### Timing of this consultation

This consultation will run for 12 weeks from 30/05/2018, closing on 23/08/2018. We will not consider responses received after that date.

We have engaged with the industry and believe this provides sufficient time, as they are aware of our plans to consult.

### Responding to this consultation

Please respond to this consultation using the citizen space consultation hub at Defra:

<https://consult.defra.gov.uk/farming/carcaseclassification/>

Or by email to: [carcase.classification@defra.gsi.gov.uk](mailto:carcase.classification@defra.gsi.gov.uk)

Or in writing to:

Department for Environment, Food and Rural Affairs,  
Livestock Team,  
Seacole Block,  
2 Marsham Street,  
London SW1P 4DF.

## After the consultation

After the consultation, a summary of the responses to this consultation will be published and placed on the government website at: [www.gov.uk/defra](http://www.gov.uk/defra).

The summary will include a list of names and organisations that responded but not personal names, addresses or other contact details. However, information provided in response to this consultation document, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes e.g. Freedom of Information Act 2000 (FOIA) and the General Data Protection Regulation (the Data Protection Act 2018).

If you want information, including personal data that you provide to be treated as confidential, please state clearly in writing, when you submit your response to the consultation, why you need to keep these details confidential. If we receive a request for disclosure under the FOIA, we will take full account of your explanation, but we cannot provide an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

This consultation is being conducted in line with the “Consultation Principles” as set out in the Better Regulation Executive guidance which can be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

If you have any comments or complaints about the consultation process, please address them to:

By e-mail: [consultation.coordinator@defra.gsi.gov.uk](mailto:consultation.coordinator@defra.gsi.gov.uk)

Or in writing to:

Consultation Co-ordinator,  
Department for Environment, Food and Rural Affairs,  
1A, 1<sup>st</sup> Floor, Nobel House  
17 Smith Square,  
London, SW1P 3JR.

### 3. About you

This consultation is primarily directed at those engaged in activities associated with the production, sale or processing of sheep. However we know that other businesses, organisations and individuals are involved with, or take an interest in, the sheep sector. The introductory questions are intended to grasp this diversity and put your response into perspective with those of other respondents.

**Please follow the link to complete the online survey here:**

<https://consult.defra.gov.uk/farming/carcaseclassification/>

*The full list of questions can be viewed in Annex E.*

Q1) Are you, or do you represent;

- I. A livestock farmer
- II. A livestock market
- III. An abattoir
- IV. A cutting plant not connected to an abattoir
- V. A trader in livestock or meat not covered by (i) to (iii)
- VI. Other (please specify)

Q2) If you represent, or work for an abattoir, do you currently use a sheep carcase classification system?

- I. Yes, (S)EUROP
- II. Yes, another system (please specify in “comments”)
- III. No
- IV. Comments

## 4. Proposals

The first set of proposals deal with mandatory sheep carcase classification and the details thereof. It is followed by a proposal on publication of schedule of charges and prices, which would be applicable across all livestock (beef, pigs and sheep).

### Mandatory sheep carcase classification

European Regulations (the Common Market Organisation (CMO) Regulation 1308/2013<sup>3</sup>, Commission Delegated Regulation (EU) No. 2017/1182<sup>4</sup> and Commission Implementing Regulation (EU) No. 2017/1184<sup>5</sup>) provide that Member States may choose to apply a Union scale for the classification of sheep carcasses. Where a Member State chooses to apply sheep carcase classification, they must follow the relevant classification rules laid down in those Regulations. As a consequence, any mandatory classification scheme introduced by the relevant competent authority in the UK whilst we remain subject to EU rules must conform to the European (S)EUROP classification grid system<sup>6</sup>.

Currently, the classification of sheep carcasses under the CMO Regulation is non-mandatory; our proposal is to make this mandatory. The main requirements for sheep carcase classification under this system are set out in Annex B.

However, leaving the EU provides an opportunity to consider developing a bespoke system for England that would take account of future market opportunities and needs, or changes in approach as regards classification and market transparency. If we implement a bespoke system as a result of this consultation we would consult again on the specifics of the system before imposing mandatory sheep carcase classification. We will only implement one system, or the other.

We envisage that the EU system could be made mandatory by early 2019, whereas a bespoke system would take longer to develop both from a policy and technical point of view.

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<sup>3</sup> Regulation 1308/2013: <http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1522932628696&uri=CELEX:32013R1308>

<sup>4</sup> Regulation 2017/1182: [http://eur-lex.europa.eu/eli/reg\\_del/2017/1182/oj](http://eur-lex.europa.eu/eli/reg_del/2017/1182/oj)

<sup>5</sup> Regulation 2017/1184: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1524750620461&uri=CELEX:32017R1184>

<sup>6</sup> Annex A provides more information on the EU's (S)EUROP carcase classification system.



Whichever system is adopted, it is reasonable to assume there would be an increase in the cost of using an abattoir. However, many abattoirs that are applying classification on a non-mandatory basis already do this, meaning the cost is already being borne by many.

Carcase classification has been mandatory in commercial-scale abattoirs in the beef and pig sectors for many years.

Whichever system we do put in place, (S)EUROP or bespoke, it will follow these general principles of weighing at the same point, to the same dressing specification, for payment and reporting purposes. From that point on the abattoir would be free to further dress the carcass as they wish. Details of the (S)EUROP system are set out in Annex A.

## **Throughput exemption**

We have looked at premises which currently have significant sheep throughput on a weekly basis. In 2017, there were 151 abattoirs registered to slaughter sheep in England. Of these, 34 abattoirs accounted for more than 90% of all throughput.

We are proposing an exemption to mandatory classification and price reporting for abattoirs slaughtering fewer than 1,000 sheep per week (as an annual average).

Under this system, we anticipate that mandatory classification and price reporting would cover around 90% of the annual deadweight throughput in England. More information is provided in Annex C.

## **Communication of classification results to the supplier**

The government has made public commitments to “explore with industry how the collection and dissemination of market data can be improved in the longer-term to drive greater transparency<sup>7</sup>”.

We believe that greater transparency can lead to productivity improvements.

Therefore, commercial scale abattoirs undertaking carcass classification should report information on the result of classification back to the supplier in a timely manner. This information will help farmers better understand the value of their production systems, helping them to improve productivity.

This information should be reported to the supplier in a usable and understandable format.

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<sup>7</sup> In the Government's response to the Groceries Code Adjudicator's Consultation, available here: <https://www.gov.uk/government/consultations/groceries-code-adjudicator-extending-its-remit>

## Price reporting

Having good, up to date, information on prices is beneficial to the sector in helping it to plan and improve. We are proposing that abattoirs report deadweight prices weekly to the Agriculture and Horticulture Development Board (AHDB) in an approved format for subsequent publication in an aggregated format that preserves commercial confidentiality.

AHDB currently collect deadweight price information directly from abattoirs in the red meat sector. This fulfils legislative price reporting requirements but primarily it provides timely, relevant and accurate pricing data for the UK industry. For sheep, this is currently done on a voluntary basis.

Price reporting will be monitored and enforced by the RPA.

We welcome feedback on how such a system would operate.

## Impacts

Mandatory sheep carcase classification will facilitate the transmission of information through the supply chain. We expect that this will lead to fairer and more economically efficient transactions.

To deliver these benefits, the regulation may introduce some administrative and resource costs on affected abattoir businesses, who will be required to organise classification, and record and report results and prices. We anticipate that the main costs to affected abattoirs will be in terms of staff training and undertaking classification, and the limited time costs from mandatory inspections.

As part of the policy development process, Defra has conducted an initial assessment of these impacts, which suggests the additional costs are likely to be small.

The significant factors in this are the inclusion of the throughput exemption, such that only abattoirs processing over 1,000 sheep per week (as an annual average) are affected; and initial evidence that at least the majority of the abattoirs affected currently have systems, or readily adaptable systems, to enable them to fulfil the classification regulation.

We have undertaken a Regulatory Triage Assessment as the Estimated Equivalent Annualised Net Costs to Business is significantly less than the £5m per year level required for a full impact assessment.

## Evidence gaps

To further improve our assessment of the impact of a mandatory scheme for sheep, we would value further evidence of the extent to which the EU standard grid is currently used on a non-mandatory basis in abattoirs processing more than 1,000 sheep per week, and the consequential effect of compulsory classification for such plants that do not currently use the EU grid, or who use their own specifications.

Anecdotal evidence suggests that a significant majority of abattoirs that would be affected currently employ suitable operatives. Our assessment will be improved with greater understanding of the extent to which the affected abattoirs currently employ licenced classification operatives, and whether those abattoirs that currently classify sheep carcasses use their own staff or buy-in services.

**Please follow the link to complete the online survey here:**

<https://consult.defra.gov.uk/farming/carcaseclassification/>

*The full list of questions can be viewed in Annex E.*

Q3) Are you in favour of mandatory sheep carcass classification in England?

- I. Yes
- II. No
- III. Comments

Q4) Which system of carcass classification should be used?

- I. The EU's (S)EUROP Grid (outlined in Annex A)
- II. A bespoke system (to be developed in future)
- III. Comments

Q5) If we were to move to a bespoke system of carcass classification what would be the most important aspects?

- I. Comments

Q6) Is the throughput exemption set at the right level?

- I. Yes
- II. No
- III. Comments

Q7) What information should AHDB be publishing, under what categories?

- I. Comments

Q8) What impact, in terms of administration and other costs, do you expect mandatory sheep carcass classification regulation to have on your business? Please provide reasons and evidence where possible for your answer.

- I. Comments

## Publication of schedule of charges and prices

This section applies to all livestock, including beef pigs and sheep.

In the interests of improving fairness in the supply chain and to make clear the conditions on which animals are delivered to the abattoir, the government is considering requiring commercial scale abattoirs to publish their schedule of charges for services connected with slaughtering of livestock e.g. the cost of cleaning animals, classification charges and insurance.

In addition, all abattoirs must provide suppliers with pricing information based on the standard specification upon request.

We welcome feedback on how such a system would operate.

**Please follow the link to complete the online survey here:**

<https://consult.defra.gov.uk/farming/carcaseclassification/>

*The full list of questions can be viewed in Annex E.*

Q9) What elements should be included in the published schedule of charges?

I. Comments

## 5. Annexes

### Annex A- (S)EUROP classification system for sheep

The (S)EUROP classification basis is as shown below.

**The union scales for the classification of sheep carcasses are as follows:**

**Conformation classes** – (S), E, U, R, O and P

**Fat classes** – 1, 2, 3, 4 and 5 (sub-classes L & H on fat classes 3 & 4)

The 15 point scale can be utilised if desired

The definitions of "carcase" and "half-carcase":

- "carcase" means the whole body of a slaughtered animal as presented after bleeding, evisceration and skinning;
- "half-carcase" means the product obtained by separating the carcase symmetrically through the middle of each cervical, dorsal, lumbar and sacral vertebra and through the middle of the sternum and the ischiopubic symphysis.

#### **Categories**

The carcasses shall be divided into the following categories (covering all sheep):

- a. Carcasses of sheep under 12 months old
- b. Carcasses of other sheep.

Communication on the results of the classification should be done for all sheep.

#### **Price reporting**

Information will be collected on date of kill, dressing specification, weight, fat class, conformation, kill number and price. They shall be broken down into categories:

- a. New Season Lambs – this year's clean male and female sheep (no permanent incisor teeth erupted)
- b. Old Season Lambs – last year's clean male and female sheep (no permanent incisor teeth erupted)
- c. All other sheep

#### **Classification**

The carcasses shall be classified by successive assessment of:

Conformation, defined as follows:

- Development of carcase profiles, in particular the essential parts (hindquarter, back, shoulder)

### ***Conformation class and Description***

S Superior – All profiles extremely convex; exceptional muscle development (double muscled carcase type).

E Excellent – All profiles convex to super-convex; exceptional muscle development.

U Very good – Profiles on the whole convex, very good muscle development.

R Good – Profiles on the whole straight; good muscle development.

O Fair – Profiles straight to concave; average muscle development.

P Poor – All profiles concave to very concave; poor muscle development.

### ***Fat cover***

1 Low – None up to low fat cover.

2 Slight – Slight fat cover, flesh visible almost everywhere.

3 Average – Flesh with the exception of the hindquarter and shoulder, almost everywhere covered with fat, slight deposits of fat in the thoracic cavity.

4 High – Flesh covered with fat, but on the hindquarter and shoulder still partly visible, some distinctive fat deposits in the thoracic cavity.

5 Very high – Entire carcase covered with fat; heavy deposits in the thoracic cavity.

### ***EU Presentation***

Carcases and half-carcases shall be presented without the head (severed at the atlantooccipital joint), the feet (severed at the carpometacarpal or tarso-metatarsal joints), the tail (severed between the sixth and seventh caudal vertebrae), without the udder/cod fat, genitalia, the liver and the pluck. Kidneys and kidney fat are included in the carcase.

### ***Weighing***

The animal must be weighed according to the specification above to the nearest 100g.

The weight to be taken into account must be the warm weight of the carcase taken not later than one hour after the animal has been stuck (i.e. at the point of slaughter). The cold weight of the carcase must correspond to the warm weight less 2% (as per beef/pigs), or the hot weight rebates of 25.5 kg & under = 0.5kg, & 26 and over = 1kg, which ever Defra decide.

### ***Identification of carcasses***

Classified carcasses and half-carcasses shall be identified by marking or labelling.

## Annex B – Details of the EU requirements for sheep carcase classification

Please note that the EU sheep carcase classification system will be undergoing changes, and so this is a description of the system that will exist from July 2018. As we are considering the possibility of mandating this system in early 2019, these are the requirements that would be in place, if we were to do that.

Requirement of EU system	Implementation requirements that would apply (and likely delivery bodies)
All sheep carcase classifiers to be licensed by the competent authority; there must also be a competent authority process for withdrawing the licence and for appeals.	Currently conducted by RPA for beef; RPA's responsibilities will be extended to cover mandatory sheep classification.
Abattoirs must ensure that sheep are presented for classification in line with the detailed requirements for presentation set out in the Regulation (adhering to the dressing specifications, offal removed etc.).	Responsibility of abattoir, verified by RPA in on-the-spot checks.
Classification for fat and conformation must be carried out and the animal graded according to the (S)EUROP grid.	Responsibility of classifier, verified by RPA in on-the-spot checks.
The recorded market price must be that paid to the supplier, net of VAT and expressed per 100g of carcase weight. It must be the cold weight and where necessary, the specified corrective factors should be applied to calculate the price.	Responsibility of abattoir.
On-the-spot checks must be carried out by an independent party (or the competent authority) to verify that classification is being carried out correctly. There is a minimum throughput threshold for these checks and for sheep they are required to take place at abattoirs where 1000 sheep per week or more are slaughtered (based on an annual average).	Conducted by RPA.
Video Imaging Analysis (VIA) machines – where these are used they must be authorised by the competent authority following an authorisation test.	Responsibility of abattoir, verified by RPA during testing, installation and ongoing checks. No sheep VIA machine has been approved for use in UK, any machine would initially need to undergo Commission certification in the period whilst the UK remains subject to EU rules before could be adopted for use in UK.
During the period that the UK remains subject to EU rules, should the EU Commission's Inspection Committee wish to verify that classification is being carried out	Responsibility of the abattoir to allow access and of the competent authority.



<b>Requirement of EU system</b>	<b>Implementation requirements that would apply (and likely delivery bodies)</b>
properly, the Member State must provide access to facilitate this.	
Classification and price reporting - the classification results and prices must be reported by the abattoirs subject to on-the-spot checks to the central competent authority.	Responsibility of abattoir to report classification results and prices, verified by RPA.
The competent authority must provide the Commission with a list of the abattoirs subject to price reporting requirements.	Responsibility of competent authority.
The central competent authority must report the representative prices to the Commission by noon (Brussels time) every Wednesday.	Responsibility of AHDB, monitored by RPA.

## Annex C – Thresholds for sheep carcase classification

The table below demonstrates the breadth of impact of a variety of different throughput threshold, based on 2017 Food Standards Agency data on the throughput of all licenced abattoirs in England.

Whether an abattoir is subject to mandatory carcase classification and price reporting will be based on its weekly throughput, regardless of how the animal is procured.

As we are focusing on deadweight pricing, we are proposing the sheep that are procured live-weight will not be subject to mandatory price reporting, so the price reporting coverage will naturally be less than the carcase classification coverage<sup>8</sup>.

We welcome feedback on this proposal.

Average weekly throughput threshold	Number of abattoirs affected	Percentage of annual England throughput affected
500 sheep	46	94.8%
1000 sheep	34	90.4%
5000 sheep	10	62.3%

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<sup>8</sup> In 2017 12,807,649 lambs were slaughtered in Great Britain. Of which, AHDB estimate 46% were procured live-weight and 54% were procured deadweight.

## Annex D – Legal details of sheep carcase classification scheme

We would aim to mirror the beef carcase classification scheme wherever possible.

### Licensing and Assessment

We propose that carcase classification would be carried out by qualified classifiers who have obtained a licence for the manual classification of carcasses. Classifiers would be required to undergo an assessment before being eligible for a licence. The testing, licensing and checking of ongoing proficiency of the classifier will be carried out by the RPA.

The licensing and assessment requirement will apply to all authorised grading techniques including automated, semi-automated and manual. Conditions may be imposed on any licences granted, as with beef carcase classifier licences. Where a licence has been issued it is intended the following will apply:

- A licence or any condition can be varied;
- A licence can be revoked where a significant number of incorrect classifications, presentations or identifications take place;
- A licence can be suspended or revoked if the person has broken the terms or conditions of the licence or where it is no longer appropriate for the licence holder to carry out classifications;
- A licence can be suspended or revoked if any automated grading equipment approved in future no longer meets the standards required, whether this is due to the equipment or the operator's use of the equipment.

Please note that these are the same rules that apply presently to beef carcase classifiers licences.

### Enforcement

This guidance is based on the enforcement of the Beef and Pig Carcase Classification Regulations<sup>9</sup>, under which the breach of certain provisions are offences. It is proposed that similarly for sheep carcase classification failure to comply with certain requirements of the classification system will be offences.

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<sup>9</sup> The Beef and Pig Carcase Classification (England) Regulations 2010 (note that these are being updated to take into account the new EU regulations (2017/1182 and 2017/1184):

<http://www.legislation.gov.uk/ukxi/2010/1090/contents/made>

It is likely that the proposed offences will be similar regardless of the nature of the classification system selected, although there may be some differences under a future bespoke system.

### **Compliance offences:**

The proposed offences will relate to failing to comply with the requirements as to:

- Presentation
- Classification (conformation & fat cover);
- Weighing;
- Identification of carcasses (marks and labelling);
- Record keeping; and
- Allowing access (no obstruction).

There may be additional offences developed if a bespoke system is developed.

The proposed penalty for such offences on summary conviction is an unlimited fine not exceeding the statutory maximum for the offence of misleading marks.

### **Notification and licence offences**

In line with the regulations for beef and pig carcass classification, it is proposed that where an abattoir used for slaughtering sheep is required to notify registration details or to report information on prices to RPA, failure to comply with either of these requirements will be an offence.

It is also proposed that offences and penalties in line with those relating to licences for beef carcass classification will apply to sheep carcass classification. The regulations for beef carcass classification provide:

- If classification is carried out at an approved abattoir (manually or by means of automated grading equipment), without a licence granted, or in breach of any term or condition of such a licence, both the person who carries out the classification and the operator of that abattoir are each guilty of an offence.
- Any person who makes an alteration to a licence granted is guilty of an offence.
- The penalties for such offences on summary conviction is an unlimited fine in addition to revoking of individuals licences.

As with the legislation for beef carcass classification inspections will be unannounced, take place at regular intervals or on a risk basis, and the powers of entry will be as it stands at present.

## **Powers of entry**

It is proposed that the powers of entry that apply to beef and pig carcase classification will also apply to sheep carcase classification.

These provide that an authorised officer may at any reasonable hour enter an approved abattoir and any associated premises in which carcasses may be handled or records relating to those carcasses may be kept, for the purpose of checking whether:

- Any offence under these Regulations is being or has been committed on the premises; or
- There is on the premises any evidence of any such offence.

The officer may be accompanied, including by any representative of the European Commission (whilst the UK remains subject to EU rules) or the government (whichever is most relevant according to the nature of the classification system enacted).

If there are reasonable grounds, or a need for urgency, a warrant may be authorised allowing an officer to enter the premises, if need be, by reasonable force.

## **Inspections**

It is proposed that inspections shall be carried out unannounced, at regular intervals or on a risk basis with varying frequency and relative to the volume of sheep production. It is intended that the powers of authorised officers who enter premises regarding beef and pig carcase classification will also apply in respect of sheep carcase classification. These allow authorised officers to:

- Inspect carcasses on the premises;
- Examine records which the operator is required to keep;
- Require copies or extracts of records to be produced;
- Retain records which the officer believes may be required as evidence.

## Annex E – Consultation questions

Please follow the link to complete the online survey here:

<https://consult.defra.gov.uk/farming/carcaseclassification/>

Q1) Are you, or do you represent;

- I. A livestock farmer
- II. A livestock market
- III. An abattoir
- IV. A cutting plant not connected to an abattoir
- V. A trader in livestock or meat not covered by (i) to (iii)
- VI. Other (please specify)

Q2) If you represent, or work for an abattoir, do you currently use a sheep carcass classification system?

- I. Yes, (S)EUROP
- II. Yes, another system (please specify in “comments”)
- III. No
- IV. Comments

Q3) Are you in favour of mandatory sheep carcass classification in England?

- I. Yes
- II. No
- III. Comments

Q4) Which system of carcass classification should be used?

- I. The EU’s (S)EUROP Grid (outlined in Annex A)
- II. A bespoke system (to be developed in future)
- III. Comments

Q5) If we were to move to a bespoke system of carcass classification what would be the most important aspects?

- I. Comments

Q6) Is the throughput exemption set at the right level?

- I. Yes
- II. No
- III. Comments

Q7) What information should AHDB be publishing, under what categories?

- I. Comments

Q8) What impact, in terms of administration and other costs, do you expect mandatory sheep carcase classification regulation to have on your business? Please provide reasons and evidence where possible for your answer.

I. Comments

Q9) What elements should be included in the published schedule of charges?

I. Comments

END