



Scottish Government  
Riaghaltas na h-Alba



Department  
for Environment  
Food & Rural Affairs

# Consultation on revised charges for the National Residues Control Programme

Annex document

November 2025

We are responsible for improving and protecting the environment. We aim to grow a green economy and sustain thriving rural communities. We also support our world-leading food, farming and fishing industries.

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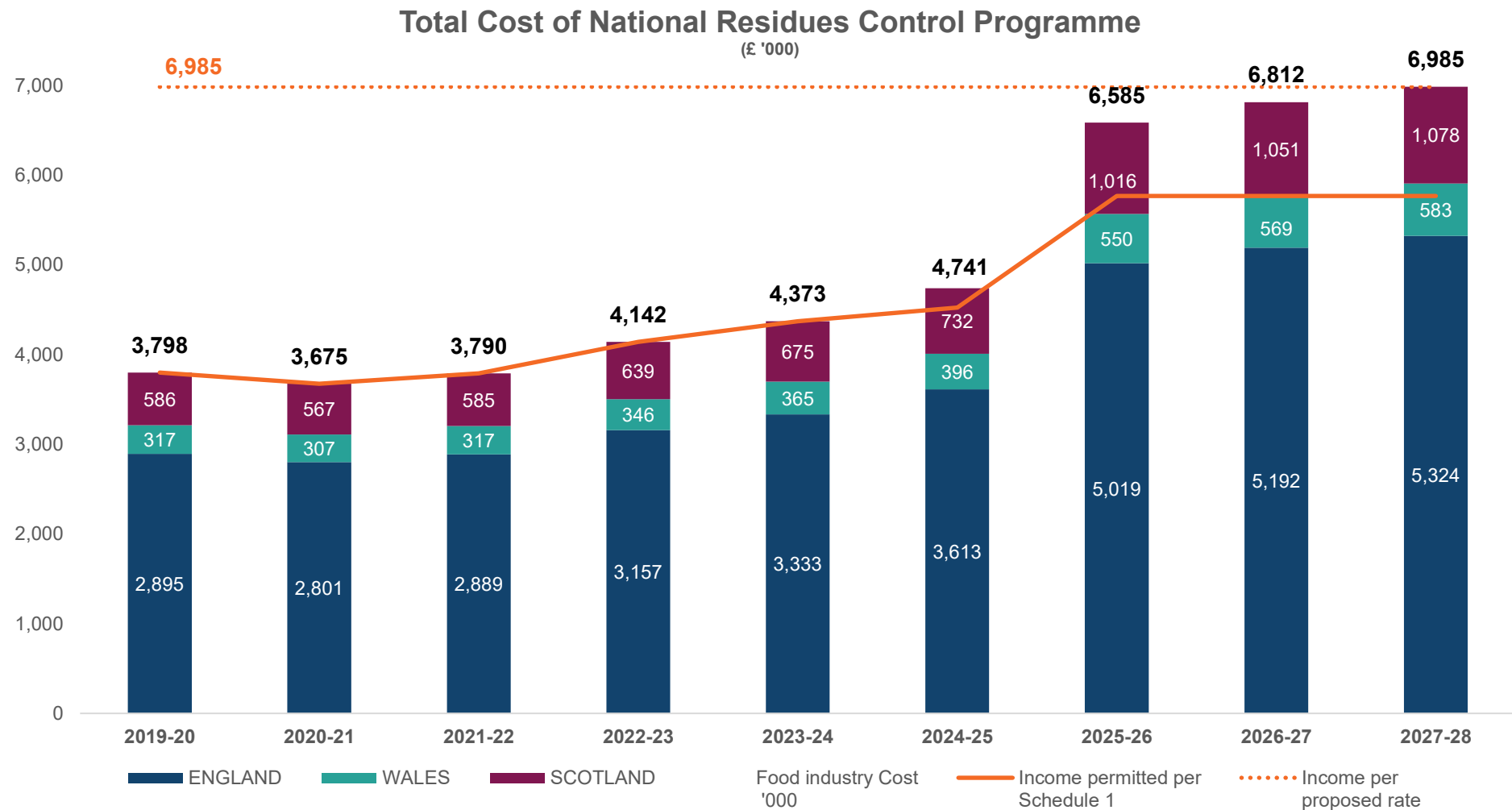
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### Table 1: costs of the NRCP

[illegible]

## Graph 1: costs of the NRCP (£000s)



Please refer to the Rationale section of the consultation which explains the trends indicated by this graph.

**Table 2: proposed changes to Schedule 1**

Type of animal or animal product	The Charges for Residues Surveillance (Amendment) Regulations 2024 for charges (£) on or after April 2025	Proposed charges (£) in 2026 - 2027	Actual increase (£)	Proposed charges (£) in 2027 - 2028	Actual increase (£)
Bovine	0.7617 per carcase	0.9964 per carcase	0.2347 per carcase	1.0216 per carcase	0.0252 per carcase
Goat	0.0751 per carcase	0.0864 per carcase	0.0113 per carcase	0.0886 per carcase	0.0022 per carcase
Sheep	0.0751 per carcase	0.0864 per carcase	0.0113 per carcase	0.0886 per carcase	0.0022 per carcase
Soliped	0.4660 per carcase	0.5359 per carcase	0.0699 per carcase	0.5495 per carcase	0.0136 per carcase
Swine	0.0735 per carcase	0.0845 per carcase	0.0110 per carcase	0.0867 per carcase	0.0022 per carcase
Game and wild game	1.0461 per tonne	1.0461 per tonne	0 per tonne	1.0461 per tonne	0 per tonne
Poultry	0.6432 per tonne	0.7397 per tonne	0.0965 per tonne	0.7584 per tonne	0.0187 per tonne
Eggs	0.0206 per case of 360	0.0237 per case of 360	0.0031 per case of 360	0.0243 per case of 360	0.0006 per case of 360
Milk	0.0405 per 1000 litres	0.0466 per 1000 litres	0.0061 per 1000 litres	0.0478 per 1000 litres	0.0012 per 1000 litres
Fish other than trout	2.3546 per tonne of marketed product	2.7078 per tonne of marketed product	0.3532 per tonne of marketed product	2.7764 per tonne of marketed product	0.0686 per tonne of marketed product
Trout	2.8222 per tonne of fish food	3.2455 per tonne of fish food	0.4233 per tonne of fish food	3.3278 per tonne of fish food	0.0823 per tonne of fish food

**Table 3: an illustrative example of the likely financial impact of the proposals on the bovine sector in the NRCP**

Bovine sector in GB	Value	Comments
Actual 24/25 throughput (the total number of carcasses processed)	2,283,323	
Current charge per carcass as per Schedule 1	£0.7617	
<b>Expected charge to be invoiced to the sector during the 2025 to 2026 financial year</b>	<b>£1,739,207</b>	<b>£1.7m expected charge against the expected 25/26 cost of £2.2m</b>
Proposed rate per carcass 2026 to 2027	£0.9964	
<b>Expected charge to be invoiced to the sector during the 2026 to 2027 financial year</b>	<b>£2,275,103</b>	
Proposed rate per carcass 2027 to 2028	£1.0216	
<b>Expected charge to be invoiced to the sector during the 2027 to 2028 financial year</b>	<b>£2,332,643</b>	Full year charges at the new 2027 to 2028 rate

Based on the assumptions described in the Proposal section of the consultation, the table shows that the bovine sector would in total pay approximately £2.2million during 2026 to 2027, and approximately £2.3million during 2027 to 2028.

**Table 4: an illustrative example of the likely financial impact of the proposals on a typical bovine processor in the NRCP**

A bovine processor in GB	Value	Comments
Actual 24/25 throughput (the total number of carcasses processed)	102,404	This would be classed as a typical high-volume producer in the NRCP
Current rate per carcass as per Schedule 1	£0.7617	
<b>Expected charge to be invoiced to the processor during the 2025 to 2026 financial year</b>	<b>£78,001</b>	
Proposed rate per carcass 2026 to 2027	£0.9964	
<b>Expected charge to be invoiced to the processor during the 2026 to 2027 financial year</b>	<b>£102,035</b>	
Proposed rate per carcass 2027 to 2028	£1.0216	
<b>Expected charge to be invoiced to the processor during the 2027 to 2028 financial year</b>	<b>£104,616</b>	Full year charges at the 2027 to 2028 proposed rate

Based on the assumptions described in the Proposal section of the consultation, the table shows that a typical high throughput bovine processor would pay approximately £102,000 during 2026 to 2027, and approximately £105,000 during 2027 to 2028.



# Background

1. NRCP helps to protect human health and provides assurances about food safety and standards. The programme is a component of the United Kingdom [Multi-Annual National Control Plan \(UK MANCP\)](#) which is the framework of official control systems in place for feed and food law and animal health (including aquatic animals and bee health) and animal welfare rules. The programme currently covers the following:
  - red meat
  - poultry meat
  - farmed fish
  - eggs
  - wild and farmed game
  - honey
  - milk
  - sausage casings

## Sample collection and analysis

2. In GB around 30,000 samples are taken and analysed each year consisting of the following:
  - approximately 25,000 red meat and poultry meat samples taken at abattoirs by inspectors
  - approximately 5000 samples at farms by animal health officers
  - trout samples taken by Cefas inspectors
  - salmon samples by Marine Directorate
  - honey samples by the National Bee Unit
  - egg samples by APHA and Scottish Government
3. A sampling programme is agreed with collection agencies every September in an annual planning meeting. Samples collected in Great Britain are sent to Fera Science Ltd for analysis. Analytical methods are accredited to ISO 17025 and validated to the requirements in EU Commission Decision [2002/657/EC](#).
4. The costs of the programme are managed through Service Level Agreements between VMD and the collection agencies. The principles for charging fees are set by HM Treasury in [Managing Public Money](#). The basic principle states that 'the standard approach is to set charges at a level to recover full costs. This full cost-recovery approach means that the regulated bear the cost of regulation, as well as ensuring the VMD does not profit from fees or make a loss which must then be subsidised by Defra or wider Government.

## Legislative and territorial context

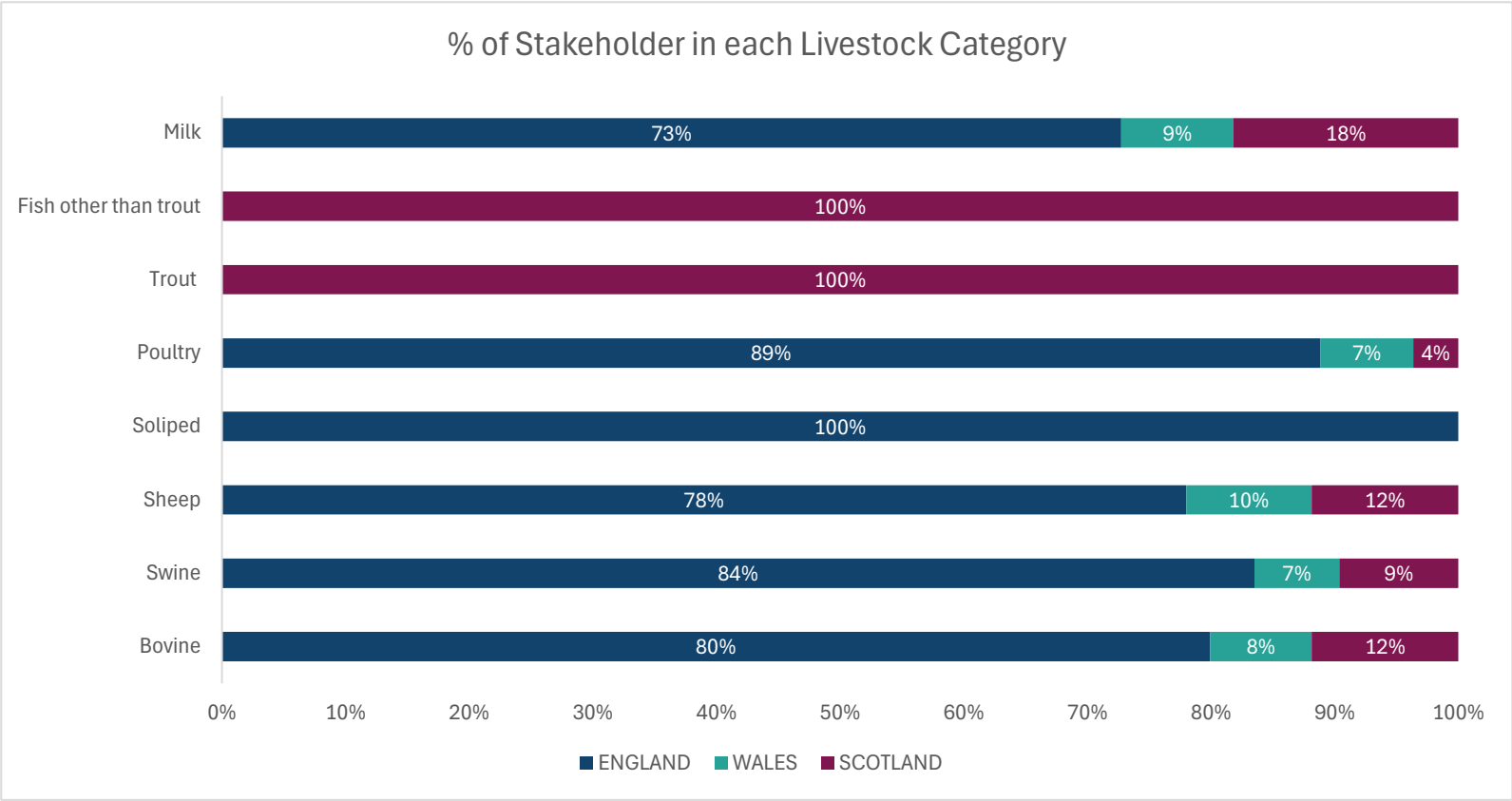
5. Residues policy and surveillance is devolved in the UK but in practice, the VMD takes the lead on the NRCP for Great Britain. The VMD works in close partnership with the Scottish Government and the Welsh Government. Table 5 shows the regional breakdown of stakeholders in the NRCP. This is also shown in graph 2.
6. The requirement for the control of residues in Products of Animal Origin (POAO) is a domestic legislative requirement to ensure food safety, and stems from several pieces of retained EU law:
  - Directive 96/23/EC – which outlines approaches to sampling and testing frequencies
  - Directive 96/22/EC – which outlines approaches to prohibited substances
  - The Animals & Animal Products Regulation 2015 which transposes the above two pieces of legislation and provides for enforcement powers
  - The Official Controls Regulation 2017 which consolidates requirements for official controls
  - The Charges for Residues Surveillance Regulations 2006
7. The requirement for control of residues in POAO also forms part of international obligations on sanitary and phytosanitary (SPS) measures – and are therefore intrinsically linked to trade. This is most clearly demonstrated in the case of the European Union, which explicitly approves trading partners for different types of POAO under [Regulation 2021/405](#) based on their residue controls.
8. GB is listed in the annex of this Regulation, with approval dependant on GB a) having a residues control plan in place that is equivalent to EU standards and b) submitting our plans and results to the EU on an annual basis.
9. Without having such residue controls in place to meet these standards we could not provide assurances on the quality and safety of our POAO to international markets, which would have catastrophic monetary and reputational impacts for GB trade.

**Table 5: regional location of stakeholders in the NRCP**

SPECIES	ENGLAND	WALES	SCOTLAND
Cattle	80%	8%	12%
Pigs	84%	7%	9%
Sheep	78%	10%	12%
Horse	100%	-	-
Poultry	89%	7%	4%
Trout	-	-	100%
Salmon	-	-	100%
Milk	73%	9%	18%
Game	n/a	n/a	n/a
Eggs	n/a	n/a	n/a

The table shows that more than 70% of businesses in each sector covered by the NRCP is in England except for trout and salmon which are all based in Scotland.

**Graph 2: regional location of stakeholders in the NRCP**



The graph shows that more than 70% of businesses in each sector covered by the NRCP is in England except for trout and salmon which are all based in Scotland

## The cost elements of the NRCP

1. The NRCP has the following main cost elements which are all required to deliver the programme. The VMD, the Scottish Government and the Welsh Government works closely with various specialist delivery partners such as Fera Ltd, FSA, CEFAS, APHA and others to deliver aspects of the programme.
  - i. External contracted costs
    - a. sampling costs
    - b. testing costs
    - c. processing costs
  - ii. Other external factors which impact costs
    - a. species production levels
    - b. a Long-Term Service Agreement for testing of samples
  - iii. VMD internal costs
    - a. staff cost and overheads to deliver the scheme.

## The role of collection agencies

Contracted Partner	Role
Fera Ltd	Analysis of all samples
APHA	Collection of samples on livestock farms
APHA, National Bee Unit (NBU)	Collection of samples from bee farms
APHA, Egg Marketing Inspectorate (EMI)	Collection of eggs (in England and Wales)
Cefas	Collection of trout samples (in England and Wales)
Food Standards Agency	Collection of samples at abattoirs (in England and Wales)
Food Standards Scotland	Collection of samples at abattoirs (in Scotland)
Marine Directorate	Collection of samples of salmon & trout (in Scotland)
Scottish Government	Collection of samples of eggs & honey (in Scotland)

## How charges are calculated for each sector

### Milk

2. To calculate the charges which will apply for milk testing, we first obtain an estimate of total UK milk production based on data from the previous year. From this we can calculate the number of samples we are required to take and the costs of collection and analysis. We then calculate the charge per 1000 litres of milk that is needed to recover these costs.
3. All the milk samples to be tested are taken from dairy farms to ensure that we can trace the origin of any residues detected.
4. With around 15,000 dairy farmers in the UK, we may not take a sample from a particular farm very often, especially if the production there is small.
5. Rather than invoice every farmer, we charge fees to milk processors or milk buyers that collect milk from farms and to those dairy farmers that sell milk directly to the public (direct sellers). This approach reduces the overhead costs of the scheme, and the legislation allows each dairy to recover the costs of testing the milk from the farms they buy milk from. The charge we make to each dairy is based on the throughput of milk for that dairy and is not affected by whether a sample has been taken in any period or not.
6. Both purchasers and direct sellers of milk are required to make an annual declaration to the Rural Payments Agency (RPA) detailing the amount of milk and/or milk products purchased or sold as appropriate. It is this data that RPA provides in order to calculate the charges due for each dairy and raise invoices as appropriate.
7. Milk purchasers (also referred to as 1<sup>st</sup> Purchasers) are invoiced every 6 months and farms selling milk directly to the public are invoiced annually.
8. Milk samples are taken on-farm by Animal Health Officers.

### Red meat and poultry meat

9. To calculate the charges which will apply to the red meat and poultry meat sector we do the following:

- obtain the figures for the estimated production of each type of livestock for the coming year in England, Scotland, and Wales, based on data from the previous year provided by Defra
- calculate the number of samples that we are required to take and what analysis needs to be carried out on those samples
- determine the costs of collecting and analysing the samples

10. We then calculate the fee per carcass necessary to recover the above costs.

11. Poultry abattoir fees are calculated from validated throughput (slaughter) data supplied by the FSA and FSS.

12. We raise quarterly invoices for all abattoirs and meat processing plants, based on their throughput multiplied by the fee per carcass. The charge is based on the number of animals processed by a business in a particular period, rather than the number of samples taken from that site.

13. Meat samples are taken by FSA officials.

14. For abattoirs and poultry processors with a small throughput, we may not take samples every quarter.

## Fish

15. To calculate the charges for fish (excluding trout) we obtain an estimate of total UK fish production based on data from the previous year. From this we calculate the number of samples we are required to take and the costs of collection and analysis per sample. We can then calculate the charge per tonne of marketed product that is needed to recover these costs.

16. For farmed salmon we receive annual figures of salmon harvested at farms (by total gutted weight) from the Crown Estate Commissioners for the previous calendar year. Salmon farmers will then be invoiced based on this data.

17. The fees for trout farmers are based on quantities of trout feed supplied by feed mills. Trout feed manufacturers pay the fees to the British Trout Association, who then remit the fees.

18. Samples are taken from fish farms by officers from CEFAS in England and Wales, or by Marine Directorate in Scotland. Samples may not be taken from a particular fish farm very often if its production is small. Therefore, the charges are based on the throughput of fish, rather than if a sample is taken in any period.

## Game

19. To calculate the charges for farmed game we obtain an estimate of total production based on data from the previous year. From this we calculate the number of samples we are required to take and the costs of collection and analysis per sample. We can use this to calculate the charge per tonne of marketed product that is needed to recover these costs.
20. All game suppliers and processors must be registered with FSA. They are required to provide throughput data to the VMD on a quarterly basis and are then invoiced based on the throughput data received.
21. Samples of game are taken by FSA officials at abattoirs.

## Eggs

22. Defra's Egg Marketing Inspectors (EMIs) collect egg samples from packing stations in England & Wales. Egg Marketing Officers (EMOs) do the same in Scotland.
23. To reduce the administrative burden on egg companies from the throughput reporting and invoicing requirements, the VMD has an agreement with the British Egg Industry Council (BEIC). The BEIC now pays the residues surveillance charge for eggs direct to the VMD and recovers the costs as it sees fit from its members. This agreement has resulted in substantial savings to the egg industry in respect of residues surveillance.
24. The charge paid by the BEIC represents the full cost of running the statutory surveillance programme for residues of veterinary medicines and certain other substances in eggs in Great Britain. This includes the collection and transport of samples, analytical costs, and follow-up inspections on the farm of origin of non-compliant results.



## Value for money

25. Value for money is a key principle underpinning the governance of the residues surveillance programme. The following procedures are in place to ensure value for money:

- the sampling programme is agreed with collection agencies in an annual planning meeting and agreed costs are set out in Service Level Agreements (SLAs)
- samples collected in Great Britain are sent to Fera Science Ltd, York, for analysis
- the VMD operations manager has responsibility for negotiating operational costs with collection agencies. The aim is to charge each sector as accurately as possible for the actual costs incurred
- audits are a key part of the programme, for all parties involved: both Fera and AFBI are designated national reference laboratories (NRLs) and each is audited approximately every 18 months
- the VMD audits all the sample collection agencies on a periodic basis

## External audits

26. Europe is a key destination of UK products of animal origin with average trade values of £8billion per annum. The European Commission's DG Health and Food Safety, known as DG SANTE-F, sends missions to audit Member States to ensure that official controls are being appropriately carried out by official bodies. DG SANTE-F also inspects non-EU countries to check that they apply equivalent standards for exported goods, which applies to the UK. The VMD, as the designated Competent Authority for veterinary medicines, is the focal point for these audits. Missions also generally involve visits to farms, abattoirs, veterinary practice(s), wholesalers, and Animal Health Offices over two to three weeks and are co-ordinated by VMD in collaboration with Defra, the APHA and FSA.

27. The UK is also subject to audits by non-EU countries, which can either take the form of detailed questionnaires, or dedicated visits by auditors. Hosting third country trade missions is an important piece of work which demonstrates that our

residues controls are robust, to give trading partners the necessary assurances about the quality and safety of UK produce.