



Chartered
Institute of
Environmental
Health

Evidence to the Environment, Food and Rural Affairs Select Committee on the discovery of horsemeat and traces of pig DNA in supermarket burgers

Submission of the Chartered Institute of Environmental Health (CIEH)
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1. The emergence of reports that suggest the detection of tissue in 'beef-burgers' not from the animal to which it was purported to derive has clearly offended the sensibilities of the population at the large. Whilst one can appreciate the implications for religious observance, the general consumer has a common law right to expect that the food they eat is not harmful, and this is supported by a statutory duty to expect what they eat to be of the 'nature' demanded. In addition, the manufacturer is charged with ensuring that the food is 'safe' and there is a general requirement on all who receive or distribute food or food ingredients to maintain records for the purpose of 'traceability'.
2. Such is the current regulatory set-up that responsibility for arriving at this simple aim is shared between two government regulators and two local government enforcers. In some respects the distinction between the role performed by Defra and the FSA is unimportant as there should be a common purpose in their discourse with all of those that have a part to play in the food chain - from 'farm to fork' or 'stable to table'. If the problem experienced in Ireland is to serve any beneficial purpose in the UK it will be to focus attention on the weakest points in this chain, since margins are traditionally very low in this sector and the temptation to cut costs can be great. This is not an excuse for misconduct but an explanation.
3. Equally, the distinction between the role of Trading Standards Officers to protect the consumer's interests, and the Environmental Health Practitioner's role in protecting their health, might reasonably be lost on the consumer since in this case they add up to the same thing - tissue derived from a horse or pig is not the same as tissue derived from a bovine and so purporting to be beef. In practice, were some of the constituents of beef products at the cheaper end of the market made better known to consumers they would likely be more concerned still for their long-term health and welfare, but provenance remains an important factor in its own right. One senses that this will be something that the larger retailers who commission the manufacture of 'own label' products will be considering, and hopefully this will focus general attention on meat products that incorporate tissues of more than one animal species.
4. At this point the CIEH, as the body with a professional interest in the training of EHPs and the delivery of environmental health services in the UK, would wish to add only to the debate by saying that an inability to properly account for the ingredients of any foodstuff might reasonably be suggestive of other shortcomings, any of which might endanger health. If it transpires, as one would suspect, that this problem extends this side of the Irish Sea and elsewhere in Europe, it might be that the regulator needs to consider whether the 'Hazard Analysis Critical Control Points' (HACCP) system (used extensively in the food manufacture to identify hazards and control risks) needs to place greater focus on the nature and origin of ingredients. Beyond this, and given our wider public health remit, we deplore the actions of those unscrupulous people that would disregard the welfare of the poorest in our society, and would wish all with an influence to bring to bear on this situation to rejoin their efforts in protecting the most vulnerable who rely, more than others, on regulators and enforcers to protect them.