

London Food Co-ordinating Group's Approvals Sub Group

Minutes of Meeting held on 29 July 2009
City of London offices, Walbrook Wharf, EC4

Food authority	Officer attending	Apologies
Barking & Dagenham	Hope Robinson	
Brent		Fiona Inston
Brent	Shamsul Islam	
Camden	Yinka Fagbohunka	
"	Sayer Galib	
Croydon		Brian Griffiths
Enfield		Rob Bartlett
Hackney	Nigel Whiteley (Chair)	
Havering	Andy Bourlet	
Hounslow	Juliet Isitt	
Islington		Carole Milligan
Kensington & Chelsea		Linda Wheeler
Kingston	Keith Fowler (Minutes)	
Lewisham	Paul Magrath	
Merton	Pip Barnes	
Newham		Matthew Collins
Redbridge	Henry Katsande	
Richmond		Reena Mistry
Sutton	Jenny Winslet	
Tower Hamlets	Ben Milligan	
Wandsworth		Peter Riddell
Westminster	Laura Parrott	
Brentwood		Lindsay Hewitt
Chelmsford		Roy Perry
Tendring	Diane Thorpe	

Items

- 1 - The work of the Meat and Livestock Commercial Services Ltd, Consultancy Division, and in particular the Design Manuals for meat establishments seeking approval.
- A presentation by Martin Palmer and John Goodman of the MLCSL
 - 1.1 - Changes in the meat industry in the UK
 - 1.2 - Changes in the hygiene regulations
 - 1.3 - Organisation of the Meat and Livestock Commercial Services Ltd
 - 1.4 - MLCSL Design Manuals on Cutting Plants, and Processing Plants, etc
 - 1.5 - MLCSL consultancy work for meat businesses
 - 1.6 - HACCP manuals
 - 1.7 - Training for butchers
 - 1.8 - Skin-on sheep meat, ('smokies')
- 2 – Approvals Group meeting on 19 May 2009 – matters arising
- 3 – Cold stores and other establishments used for the cold storage and transport of PoAO for wholesale supply – an interim reply from FSA
- 4 – Proposed further meeting with Veterinary Meat Hygiene Advisors
- 5 - Training on the approval of food establishments, and on the Audit of HACCP systems – updates

1 - The work of the Meat and Livestock Commercial Services Ltd, Consultancy Division, and in particular the Design Manuals for meat establishments seeking approval. - A presentation by Martin Palmer and John Goodman of the MLCSL

NW introduced Martin Palmer (MP) and John Goodman (JG) of the Consultancy Division of the Meat and Livestock Commercial Services Ltd (MLCSL). MP is an economist, and JG an engineer. After our last Approvals Group meeting Carole Milligan searched for the MLCSL Cutting Plants Design Manual and came into contact with MP. He offered to give a presentation to our group on these manuals, and on the work of his organisation.

The presentation is in a separate PowerPoint document, (edited by KF to reduce it to a manageable size). However the minutes of this item have been rearranged under headings which are more applicable to food officers, and include a number of questions which officers raised but were not in the presentation. (These minutes refer to various slides in that presentation).

1.1 - Changes in the meat industry in the UK

There had been a large pool of butchers that worked in the meat industry, but with the advent of supermarkets there were now less than 7,000 traditional butcher shops. However, the latest development is a switch to farm shops, and this has resulted in a shortage of experienced butchers. Then an influx of Eastern European butchers filled the vacancies. However, these people often returned home after several years in the UK, taking their skills with them.

MP said that training was a big problem for all parts of the meat industry. There is particularly a skill shortage in the red meat industry. The old way of training butchers at Technical Colleges broke down. The butchery skills are now needed in the large cutting plants etc which supply packaged meat to the supermarkets. Farmers Markets have grown considerably, to compete with the supermarkets. Also ethnic minority shops which sell both meat and groceries have increased in number. As a result a lot of butchers' shops have closed.

JG said that the meat industry was improving, with a greater recognition that the health of animals affects the quality of the meat produced. However MP told us that there are many meat cutting plants in converted garages etc in cities and on farms.

Animal by-products, (ABP). JG said that many new FBO's do not expect the high collection costs of ABPs and try to find alternative, illegal, disposal routes. (In the past ABPs had contributed financially to the operation of meat plants).

Cutting plants in other EU countries. MP spoke about the alleged "gold-plating" of EC Regulations in the UK in comparison with other EU countries, [ie, interpreting the law more strictly than justified]. The MLCSL were given the task of visiting small slaughterhouses and butchers shops in other member states. They found in Italy and Spain that these plants were in a better condition than UK equivalents. The reason for this was that those states had used EU funds to close the small plants that were in a poor condition and to modernise the better ones. (At that time the UK was preoccupied by BSE).

Trade Associations. MP commented on the development of the meat trades associations, one of which came to be dominated by big businesses, (the British Meat Processors Association, BMPA), leading to smaller businesses setting up two other trade associations to represent them, (the Association of Independent Meat Suppliers, AIMS, and the Small Abattoir Federation).

1.2 - Changes in the hygiene regulations

MP summarised the changes brought in from January 2006 by the EC Regulations 852, 853 and 854/2004. (Slides 8 to 16). These regulations moved away from the highly prescriptive Directive EC 64/433 (on slaughterhouse hygiene) which specified how hygiene was to be achieved. The new regulations are intentionally non specific detailing the 'end result' but not how it should be achieved. In addition the regulations placed responsibility on the food business operator (FBO) to

demonstrate to the food authority his premises and operating procedures meet the requirements of the regulations. that a construction or system complied. For small businesses this was a shock.

MP said that in 2006 the MLCSL informed the FSA that a significant number of small slaughterhouses would struggle to meet the new requirements, if the generalised wording of Reg 853 was interpreted strictly by the Veterinary Meat Hygiene Advisors (VMHAs). This led to the need to revise the MLC Design Manual for slaughterhouses. (See item 1.4 below).

The effect of the marginal, localised and restricted exemptions on catering butchers.

JG spoke about the exemption for retail establishments supplying meat to other retail establishments on a 'marginal, localised and restricted' basis. Each member state had to interpret these terms as it deemed appropriate for its country. In the UK these terms are interpreted by the FSA in the 'Meat Industry Guide' and the Food Law Practice Guidance. (Slides 17-24, & 25-28).

NW said that 'local' was defined precisely. Therefore if a food officer found food and invoices for food of animal origin that had come from an establishment outside the local area, then he had evidence for prosecution of the supplying establishment.

MP considered that the 'local' part of the exemption was a problem for a supplier to markets at the other end of the country.

The FSA enforcement letter ENF/E/08/036 partially deals with this: 'Retailers' distribution centres, and the supply by the producer to the final consumer at markets'

MP said that most butchers shops are now 'catering butchers', in that they supply some local restaurants etc (as a marginal part of their business). JG considered most catering butchers preferred to be exempt from approval as they saw EHOs as a lesser problem for them than the FSA and Meat Hygiene Service (MHS). However MP argued that approval was an advantage, especially for a business with expansion plans likely to exceed the 'marginal' supply (of 2 tonnes/week of meat, and a quarter of the business). He found catering butchers wanted to stay exempt, but he advised them to rebuild their plants to meet the requirements of Reg 853/2004 so that their businesses would be ready for approval when needed.

1.3 - Organisation of the Meat and Livestock Commercial Services Ltd

The Meat and Livestock Commission (MLC) started in 1968 as one of the 'levy boards'. (These boards collected a levy, a 'para-fiscal tax', from the producers, eg, the slaughterhouses). The levy boards were merged in 2006 to form the Agriculture and Horticulture Development Board (AHDB), under which the MLCSL was created.

Although called 'Commercial Services', the MLCSL does not aim to make a profit. The MLCSL receives some of its funding from levies, some from the government, and some from clients for services provided by the MLCSL. MP said that the AHDB decided where it wanted to commit the levies raised. This included promoting hygienic standards, which in turn included promoting the work of MLCSL.

The MLCSL home-page reads:

Meat and Livestock Commercial Services Ltd (MLCSL) provides independent services and equipment on a commercial basis to the meat and livestock industry, contributing to the industry's efficiency and profitability. MLCSL is the commercial sector company of the Agriculture and Horticulture Development Board.

MP gave an outline of the four divisions within MLCSL, one of which is the Consulting Division, which MP and JG work for. The others are Authentication, Auditing, and Equipment. (Slide 4).

MLCSL contact information

Website: www.mlcsl.co.uk E-mail: info@mlcsl.co.uk Tel: 01908 844157 (Consulting team).

1.4 - MLCSL Design Manuals on Cutting Plants, and Processing Plants, etc

Reg 853/2004 requires the FBO to demonstrate to the competent authority that a particular construction or system in his establishment meets the legal requirements. The MLCSL wrote their Design Manuals to help FBOs with this task, by giving specific details on materials and design layouts. (Slide 32). The FSA funded the MLCSL to update the 'Slaughterhouse Design Manual', and to write two new manuals: the 'Cutting Plant Design Manual' (50 pages), and the 'Processing Plant Design Manual' (120 pages). The FSA approved these, after consulting the VMHAs. (Joanna Fullick was the main editor).

MLCSL web-page on Meat Plant Design Manual reads:

These guidance manuals have been prepared by MLCSL Consulting on behalf of the Food Standards Agency to assist those involved in the construction or modification of meat plants intended to comply with the standards required for premises operating to the EC Regulations.

The advice follows the requirements of the regulations but also includes MLCSL Consulting views of "best practice" which often exceeds the regulatory requirements but has been found to be useful in practice.

How to obtain the manuals

The manuals are available as paper documents from MLCSL at £50 each. JG and MP undertook to provide NW with either a paper copy of these or, preferably, in electronic format, for reference purposes.

MP wrote after the meeting to NW: ' we are currently exploring putting them on the MLCSL web-site in a PDF version that can be downloaded for a reduced fee (suggested around £20)'.

'Meat Industry Guide'. The latest version of this FSA guide refers to these manuals, (in Part Two, 1.2):

'Meat Plant Design Manuals': Manuals to assist those involved in the construction and modification of slaughterhouses, cutting plants and processing plants giving technical information on materials, design points, layout etc.

Contact the ~~Meat & Livestock Commission~~

- Slaughterhouse Manual: ISBN 978-1-0-4437-28-4

- Cutting Plants Manual: ISBN 978-1-904437-29-1

- Processing Plants Manual: ISBN 978-1-904437-30-7

Construction details

- External wall and floor junction, Kerb layout. (See slide 34). JG turned to the construction details for this junction, emphasising the importance of getting it right to maximise the durability of the structure.

- Loading bay. (See slide 35). MP pointed out the benefits of a 'loading dock', with a seal between the back of the delivery vehicle and the bay (to reduce contamination), and a common floor height to allow mechanical equipment to go straight into vehicles (to reduce manual handling).

- Staff entrance, to a Farm shop and cutting plant. (See slide 36). JG showed details drawn up for the expansion of a shop and cutting area, and pointed out the importance of controlling access to the plant area by having a single point of entry through a 'hygiene area'.

- Separation by time of raw from processed meat

MP said that one of the main issues for small meat establishments was a lack of space, which is needed to prevent cross-contamination from raw meat to processed meat. FBOs of such plants claimed that they separated raw from processed meat by carrying out these two operations at different times. However this was clearly broken by suppliers to some farmers' markets who operated in a kitchen. Separation by time is dependant on the trustworthiness of the FBO to actually put this into practice.

PB queried one example, (see slide 39 showing a converted barn), where access to and from a cooking and processing area was via the raw area, (used for handling sausages and mincing). JG agreed that this was not good practice, but he was satisfied in this case that separation was indeed achieved by time, and this was written into the 'Operating Schedule'. (In this case all the cutting and cooking were done by just two people, in a converted barn). He said that in small plants it was often necessary to make a compromise between minimising risk and permitting the continued use of the premises.

- Wood. JG said that VMHAs would not permit wooden cutting blocks in meat establishments seeking approval, even though butchers strongly objected to plastic cutting blocks. Several food officers present questioned this, since there is no specific prohibition on their use in Reg 852 or 853. JG explained that VMHAs were accustomed to the prescriptive requirements of the Directive on slaughterhouse hygiene, which prohibited the use of wood.

1.5 - MLCSL consultancy work for meat businesses

Most FBOs of meat businesses preferred to use the consultancy service of the MLCSL, rather than read the Design Manuals themselves. JG said the MLCSL had an industry reputation for independent advice, and were often invited to solve differences between plant operators and the VMHAs.

JG went through some examples of small businesses carrying out catering butcher operations where the MLCSL had acted as consultants on the standards for good practice. (Slides 33 & 36-39). JG designed the premises and liaised with the VMHAs to check on compliance with their standards for approval.

JG said that much of their work was for farmers expanding their business to provide on-farm cutting plants and butchers shops. He usually tried to get the FBO to look ahead, and move on from their fixed ideas on how to set up the business.

Informing meat businesses of the MLCSL consultancy

PB enquired how the MLCSL found clients. JG said this was usually from VMHAs, who were not in a position to give detailed advice. NW pointed out that EHOs are wary of giving advice to catering butchers operating without approval, (whose establishments needed approval by the FSA), because of the subsequent involvement of the VMHAs. So may we inform these FBOs of the consultancy service offered by MLCSL? MP replied yes, this is how their Consultancy division gets their business. However in practice MP has rarely dealt with EHOs, but nearly always with VMHAs.

Costs of the MLCSL consultancy

LP asked about the cost of the services provided by MLCSL. JG replied that consulting costs were £500 a day, and clients were informed of the expected number of days work involved, which for small units was about 2-3 days.

MP pointed out that funding for businesses dealing primarily in pork was available from the British Pig Executive (BPEX) which pays for one day's consultancy. JG added that BPEX would pay for that initial day to encourage small pig producers and slaughterhouses to improve standards for the production of pig products.

BPEX is another division of the AHDB. <http://www.bpex.org.uk/>

1.6 - HACCP manuals

Jl commented that MP and JG had not referred much to HACCP. MP replied that the MLCSL do give advice on HACCP. Paul Bache had written the HACCP part of the Design Manuals. MP drew a distinction between this and the generic HACCP plans written by the trade association AIMS for their members. Those HACCP plans needed to be adapted to the specific operations at each establishment. HACCP plans written by consultants often were neither owned by the businesses, nor did they reflect the practices at specific establishments.

JG informed us that in 1998 the MLC had developed the HACCP Manual: 'A practical guide to HACCP for retail butchers' for the butchers shops which needed licensing, [from 2000 till 2006]. However this manual is now semi dormant.

NW said the old MLC HACCP manual is still the most suitable for butchers, because SFBB is not intended for such specialist retailers. JW said she knew of butchers that still had the MLC HACCP manual.

JW asked if this manual could be updated and reprinted. MP said he could certainly raise this with the AHDB as it was likely to be a common problem around the UK, and the AHDB has an interest in raising standards in the meat trade. PB asked if the guidance could be extended to include the Halal trade. MP felt that this has been overlooked.

After the meeting NW found the following:

Meat Training Council 'HACCP review and guidance manual for retail butchers'
<http://unix3.nildram.co.uk/~mtcunix/links/Review%20Guide%20order%20form.pdf>

This manual is available to purchase at a price of £45.50.

1.7 - Training for butchers

NW and Jl enquired about training for butchers in HACCP.

Meat Training Council (MTC). Web-site: <http://unix3.nildram.co.uk/~mtcunix/index.htm>

MP said that the MTC is an independent accrediting body, and has always been separate from the MLC. It has established NVQ accredited courses for trainers to use, on a range of subjects from knife skills to management, and HACCP. The MTC gives a list of trainers to any businesses that enquire. The training is on-site at the butcher's premises. JW said that the cost of training is about [£125 per candidate], which includes the HACCP manual.

MP volunteered to raise with the AHDB this issue of training for butchers, in the hope of obtaining funding for the production of smaller guidance on training and HACCP. Officers agreed that this would be a useful development.

After the meeting NW found the following:

Meat Training Council 'Butchers' Hygiene and HACCP Courses'
<http://unix3.nildram.co.uk/~mtcunix/courses.htm>

The cost of the training includes a 'HACCP review and guidance manual for retail butchers'

1.8 - Skin-on sheep meat, ('smokies')

The FSA recently commissioned the MLCSL to research the potential market for 'smokies', or singed 'skin-on sheep meat' as the FSA prefers to call it, to provide information which the FSA could use to lobby the EC to amend Reg 853 so as to permit the production of this meat.

Reg 853 requires the removal of the skin from sheep and cattle, but not from pigs. In contrast, Australia permits the production of skin-on sheep and goat meat.

Many of the West African community in the UK want skin-on meat, either as smokie meat, or as illegally imported 'bush meat'. A black market in smokies increased, and peaked in about 2005.

Farmers unions have lobbied the FSA to permit the production of this meat. Their argument is that emaciated ewes, which are of little value in the legal meat trade, do have a potential market

The FSA has first to demonstrate to the EC that singed skin-on sheep meat is safe to eat. So the FSA have engaged Bristol University to investigate the bacterial contamination. MP informed us that the initial results indicate that skin-on meat can be produced safely.

The FSA has also to demonstrate that there is a market for this meat, and so they used the consultancy services of MLCSL to assess the demand. The MLCSL tried to research the trade in skin-on meat, but this was difficult because it is illegal. The national sheep market pointed MP to traders in London and Birmingham who had been prosecuted for handling smokies. He asked them about the potential trade, and because he was accompanied by a former supplier the traders divulged this information readily. MP estimated that the potential market for skin-on meat in England is 150,000 carcasses per year, which is worth £3.5m/yr.

2 - Approvals Group meeting on 19 May 2009 – matters arising

NW began by apologising for sending the minutes out so late, (on 28/07/2009). He had substantially rearranged the long, useful discussion we had on the Recommendations on Food Hygiene Inspections in the Pennington Report on the E.coli outbreak.

'Selecting a HACCP Consultant'. NW received from CM another copy of her guidance for FBOs, which he will forward to officers with these minutes.

3 - Cold stores and other establishments used for the cold storage and transport of PoAO for wholesale supply – an interim reply from FSA

NW said that he had e-mailed his eleven questions on cold stores to the FSA, and had received an interim reply from Liz Stretton of the Food Safety, Hygiene and Microbiology Division. (She had visited a meat processing establishment with Nigel Watson of L B Lewisham, and he had taken the opportunity to ask her about cold stores). Disappointingly her interim reply had not addressed some of the issues raised on the conflicts between the regulations and the official guidance, but had simply restated the FSA's existing guidance. NW read out an excerpt from her e-mail, in which she acknowledged one point NW had made (about the FSA enforcement letters omitting several of the types of cold stores etc which require approval or are exempt). She simply wrote: 'Point noted for future revisions of the Food Law Practice Guidance'.

The existing conflicting and inadequate guidance from the EC and FSA has led to some food authorities leaving the determination of which cold-storage and transport establishments require approval until the FSA issues further guidance or the FSA audits the food authority.

JW suggested that NW should contact Colin Houston directly, (the Deputy Head of Implementation and Delivery Division), for a better response, to promote consistent enforcement. JI agreed that we should approach someone of sufficient authority.

Agreed – NW to request a response from Colin Houston.

4 - Proposed further meeting with Veterinary Meat Hygiene Advisors

NW had received an e-mail from Lawson Wood (LW), a MHS Lead Veterinarian, who had given a presentation to our group on 19 November 2008. LW suggested holding another discussion on meat cutting plants operating without approval in the London area. He thought that we would all

find it useful and important to continue to improve and increase communication between food authorities and the MHS, particularly as we have so many overlapping issues to deal with. He wanted to bring along Mike Seaton, the Veterinary Officer for the City of London, who is responsible for Smithfield Market, and Laureano Garcia, Veterinary Meat Hygiene Adviser, who now carries out approval visits north of the Thames. NW asked for views on this suggestion. Agreed – NW to invite LW and MS.

5 - Training on the approval of food establishments, and on the Audit of HACCP systems – updates

Training on the approval of food establishments. NW informed the group that he had held a fifth seminar on approvals last week, this one being for food officers in north east London. He asked if there was any further interest amongst officers. The charge by L B Hackney to the authority organising the seminar was £750, (which paid for the trainer and the training notes). JI asked how many officers could attend. NW had found that 20 was a good number, with a maximum of 30. JI said she would ask her food liaison group if any authority in N W London was interested.

'Audit of HACCP systems' training. JW reminded officers of this training by Andy Bowles of ABC Food Safety to be held on 4 September. She has booked a hall in Sutton for 100 officers, and there were still places available. Those interested should contact ABC Food Safety directly. (See the e-mail forwarded on 29/07/2009 by NW).

Date of next meeting: Thursday, 3 September 2009, 09:30 – 13:00, Walbrook Wharf offices, EC4