

London Food Co-ordinating Group's Approvals Sub Group

Minutes of Meeting held on 18 March 2009

City of London offices, Walbrook Wharf, EC4

Food authority	Officer attending	Apologies
Barnet	Mark Stanbury	
Brent	Shamsul Islam	
Camden	Yinka Fagbohunka	
City of London	James Smith	
Croydon		Brian Griffiths
Enfield	Rob Bartlett	
Hackney	Nigel Whiteley (Chair)	
Havering	Andy Bourlet	
Islington	Carole Milligan	
Kensington & Chelsea		Linda Wheeler
Kingston	Keith Fowler (Minutes)	
Lewisham	James Walshe	Paul Magrath
"		Ken Giles
Merton	Pip Barnes	
Newham	Matthew Collins	
Redbridge	Henry Katsande	
Richmond	Reena Mistry	
Tower Hamlets	Ben Milligan	
Waltham Forest		Pip Broad
Wandsworth		Peter Reddell
Westminster	Laura Parrott	
Brentwood		Lindsay Hewitt
Chelmsford BC	Roy Perry	

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1 - Minutes of Approvals Group meeting on 29 January 2009 – matters arising

NW outlined the joint approach to writing the minutes, with KF recording the discussions in order of time, and NW re-arranging the draft to draw the items into themes, with a number of headings and sub headings. NW asked if this was acceptable and this was agreed

(Item 10) - Published guidance for meat producers

NW advised that Charlie MacLean, the FSA Veterinary Meat Hygiene Advisor, had confirmed he had been referring to guidance from the former Meat and Livestock Commission (MLC), but NW could not trace the document on one of the successor organisation's website, the Meat and Livestock Commercial Services Ltd.

The latest version of the 'Meat Industry Guide' states 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, PO Box 44, Snowdon Drive, Milton Keynes MK6 1AX. Tel: +44 (0)1908 677577.

- 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

(Item 14) - Cutting plants subject to approval, but operating without approval

Liaison between VMHAs and food officers

NW has yet to draw this matter to the attention of Lawson Wood, the MHS Lead Veterinarian.

Local Authority Support and Diversity Branch

NW met with Julian Ciepluch, an official in this Branch, and drew his attention to the low level of awareness amongst food officers of the Branch's existence. NW also suggested to him that the Branch could take on a liaison role between food officers and VMHAs on the approval process of cutting plants etc.

2 – 'Approval of establishments under the food hygiene regulations from 1 January 2006 – update' – FSA enforcement letter: ENF/E/09/008

NW referred to this letter, dated 5 February 2009 from Shahine Zar of the FSA Enforcement Support Division, which was highly relevant to our discussions at our meeting on 29 January, in item 14. As most members present had not seen this NW read out three main points.

<http://www.food.gov.uk/multimedia/pdfs/enforcement/enfe09008.pdf>

"Establishments subject to approval which were in operation prior to 1 January 2006.

...However, based on feedback from the Agency's Audit and Policy Branch, it has become apparent that a number of those establishments may still be operating under the transitional arrangements.

4. This letter, therefore, requests Local Authorities as a matter of urgency to ensure that all establishments that were previously approved under the old hygiene Regulations are assessed to establish compliance with current legislation, and to take appropriate action.

This is with the proviso that new start-up establishments that require approval for the first time are dealt within a reasonable period of time and in accordance with requirements. This should be at least within 28 days of either the application being received from the food business operator, or it coming to the attention of your Authority"

NW noted that the letter referred to a mere 28 day period for commencement of the approval process once a LA is aware of a business operating. RB pointed out that by their own admission neither were the VMHAs meeting this tight timescale.

Catering butchers

7. Intelligence suggests that there still remain quite a number of butchers requiring FSA approval that have not yet been notified to the Agency by LAs. I would be grateful if your officers could establish on their next programmed (or other) visit to butchers whether they do require FSA approval and, if not already notified to the Agency, provide details to Wing-Man Chan on 020 7276 8314 or at wingman.chan@foodstandards.gsi.gov.uk “

3 - Action against fairly well run meat cutting plants operating without Approval

This was a continuation of our discussion on 29 January, under (Item 14).

NW said that he has now included two scenarios in his Approval training course, which he outlined as follows:

- i - Catering butchers openly trading since 2006, but in fairly hygienic conditions.
(These establishments are committing an offence).
'Appraisal' visit by Veterinary Meat Hygiene Advisors (VMHA), to advise on requirements for approval.
Interventions and enforcement by food officers as appropriate, (under Regs 852 & 853).

- ii - Catering butchers trading from before 2006, and still in fairly hygienic conditions
(These establishments are not committing an offence, because of the derogation from the requirement for approval of such plants until approved by the FSA, or until the end of 2009).
'Appraisal' visit by CMI consultants and then VMHAs, to advise on requirements for approval.
Routine interventions as usual by food officers, with advice and/or enforcement as appropriate, (under Regs 852 & 853).

NW asked for views. Officers thought it inconsistent to restrict the operations of one catering butcher (i), but not the other (ii). JS suggested that “fairly well run” implied businesses requiring minor improvements only. NW repeated two examples of what food authorities could require, eg, the provision of hot water, or equipment to reduce the ambient temperature of cutting rooms.

PB gave an example of a meat cutting plant which, while awaiting approval by the FSA, was distributing meat across the UK. This resulted in LAs questioning the absence of an identification mark on the containers of cut meat supplied. SI considered that we should restrict the distribution of such a plant to the “local” area until the plant is approved. NW agreed, saying that any ‘retail’ cutting plant which started trading after 1 January 2006, to do so lawfully, had to restrict the supply of its meat to ‘marginal, localised and restricted, until it is approved by the FSA. RB said that we should liaise with the VMHAs before taking enforcement action.

NW summarised the opinion of those officers present that we would not stop the supply of fresh meat from a fairly well cutting plant provided the business has made an application for approval to the FSA. The onus is then on the FSA. YF concurred, saying that the delay was not entirely the business’s fault when waiting for the FSA to approve their plant.

4 - Smokies – an update

NW began reminded officers that “smokies” are singed un-skinned carcasses of mutton, slaughtered in filthy conditions. He had had a phone call from an EHO in Ceredigion in west Wales,

who informed him that they had raided a farm and had stopped the production of smokies. The farm had been operating without approval as a slaughterhouse. She had asked him for information which she could use in court on the market price for smokies in shops in London. A colleague asked a local butcher, who told him that the minimum retail price was about £5 per kilogram for carcasses. He did not find any in Hackney during the week, but he was told that there were plenty in a south London borough. Carmelo Gale, a known supplier of smokies, was around at the weekend apparently, and is still supplying carcasses. He is reportedly also selling smokie meat jointed and vacuum packed.

5 – Sushi, and preventing parasites in raw fishery products – an update

This updates the information given to the group by CM in Sep'08, item 4, and in May'08, item 7.

5.1 – Preventing parasites in raw fishery products

JS raised the topic of raw fish in sushi which concerned a catering establishment in the City of London (and a branch in Brighton). He had heard of a possible exemption from the requirement to freeze raw fishery products to kill parasites, (under Reg 853/2004), for Scottish farmed pellet-fed salmon. CM said that any cold-smoked farmed salmon is exempt from freezing, which she described as a loophole in the law. The requirement for freezing is only for cold smoked wild salmon, (Reg 853, Annex III, Sec VIII, Ch III, D, para 1(b)(iv)). Therefore the FSA have directed that farmed cold smoked salmon is not covered by the regulations and does not need to be frozen.

CM had spoken to Dr Kevin Hargin of the FSA's Fishery Products section, who informed her that the research into the incidence of parasites in farmed fish has been completed. After 271 tests, no evidence of nematodes was found in Scottish farmed pellet-fed salmon, (farmed in lochs). The pellets used to feed farmed salmon contain anti-parasite drugs. CM asked Dr Hargin if he would now write to food authorities about exemption from freezing to be granted for such salmon. Because there will be some delay, she suggested to him that she would relax her enforcement of the chain of sushi bars she is dealing, subject to documentation confirming the authenticity of its source. They agreed that this would be a pragmatic solution until the guidance on exemption is released. (JS wondered if there are any veterinary residues in farmed Salmon at the time they are killed).

In contrast to farmed salmon, CM told us of research showing nearly 100% incidence of Anisakis in wild salmon in Salmon. This parasite infects man, and also is allergenic to man.

Unfortunately Scottish farms cannot supply sufficient salmon to meet the demand.

PB said that one new Japanese business in Merton freezes its salmon to -40°C and did not regard this as reducing the taste or quality of the raw fish. However JS said that high class Japanese restaurants in the City of London resisted freezing fish.

5.2 – Proposed protocol on sushi production

CM reminded the FSA and LACORS of the protocol that they were going to produce for sushi production. She volunteered to adapt the New Zealand food safety authority's protocol, (for the Group to consider). She is awaiting a reply from the FSA.

5.3 – Training for officers on sushi and sashimi

LP advised that there was interest in Westminster CC for training on sushi by Alun Barnes of Ascensis. She asked if any other officers in the Group were interested. We were, even though the trainer may not be as up to date as CM has had to be, and considering the delay by the FSA on writing a protocol. Agreed.

6 – FSA audit of approval procedures in L B Merton

6.1 – Audit of procedures, inspection records, and enforcement action

PB informed us of her experiences last month of the FSA focussed audit of Merton's official controls of approved establishments. Their procedures were satisfactory but needed tighter controls with set review dates. She adapted the group's procedure on approvals and the auditors were satisfied with that. Although she provided procedures for approvals, prosecution, general inspections, authorised officers, internal monitoring, food alerts, sampling & food complaints and premises records prior to their visit, the auditors at their visit requested more, such as Emergency prohibition procedures and evidence of Officers' qualifications & CPD.

PB said that Merton had ten approved establishments. The FSA auditors asked for the premises files and the last three inspection findings for each of these. The auditors also asked for information on Merton's non-approved cold-stores, and said some of them should have been approved.

6.2 – Auditors visit to one approved establishment

The next day the auditors carried out a site visit to verify the accuracy of Merton's file on the establishment. She noticed that the auditors questioned the FBO, but missed their opportunity to ask the officer why she had made various decisions.

6.3 – Report on audit findings

The auditors report stated that Merton should review their procedures more frequently. Their Business Plan for Food should state more clearly which establishments they will inspect, namely those in risk categories A, B & most Cs. It should spell out which inspections were not being undertaken due to lack of resources.

PB also highlighted a difference over Conditional Approval between Merton and the auditors. PB was concerned to secure the full legal standard before granting Full Approval. She had granted Conditional Approval for the use of free-standing air conditioning equipment, but twelve months had elapsed, and she would not grant Full Approval until the establishment had installed permanent air conditioning plant. However the auditors put more weight on the food authority complying with the 6 month maximum time permitted for Conditional Approval, (in Reg 882/2004, article 31). So she said she would grant Full Approval straight away, which the auditors were satisfied with.

PB now has to write Merton's Action Plan in response to the auditors' findings.

6.4 – Audit of Chelmsford Council's inspections

RP outlined his experience of a focused FSA audit last year of Chelmsford's inspections generally. The auditors were not confident of their database of food businesses.

7 - A shop requiring approval both for cutting meat and for cold-storage

PB raised a query about a large Korean retail and wholesale business in New Maldon. This establishment has several linked activities on the same premises: importation, retail sales in a large shop, manufacture of tofu, meat cutting as a catering butcher, cold storage of products of animal origin and other foods in the large warehouse, and wholesale distribution throughout the UK.

This 'retail' establishment could not be exempted from approval because it supplied food of animal origin to other establishments far outside the 'local' area.

NW stated that approval would apply to the whole of the establishment. PB raised the question of whether her business was more than one establishment, and after some discussion there was no consensus although the majority concluded that it was just one establishment operated by one business.

PB asked what activities should be approved, and by which authority. The meat cutting activities had been assessed for approval by the MHS, who had said that the establishment was unable to meet the standards for approval, though they were not willing to state what the business needed to do to get approval. However during her recent audit the FSA auditors informed her it was their opinion that the establishment should be approved by the food authority as a 'cold store'. The MHS is not the competent authority for food of animal origin other than meat, so there could be two enforcement authorities for this one establishment.

PB was holding back from granting approval just for the wholesale cold-storage and transport as she realised that if granted, then the establishment could apply their identification mark to any food they produced in that establishment, including their cut meat.

Action - PB to raise the question of the dual enforcement authorities with the FSA

After the meeting NW clarified with PB the reasons why this establishment is subject to approval. In summary it is - a 'retail' establishment which is subject to approval for handling products of animal origin, namely cutting, cold-storing and transporting fresh meat and fresh and frozen fishery products, and supplying them outside the 'local' area to other establishments.

8 - Guides to determining the shelf-lives of foods

See also the minutes of the meeting in Jul'08, item 5, and Sep'08, item 7.

8.1 – Rewrapping dried prawns

MS found an establishment which purchased dried prawns, and rewrapped them whole in sealed bags, or crushed them up into powder. The product required cooking. There was an expiry date on the label but it was not validated by shelf-life testing. He tried to reach agreement with the business over determining the shelf-life.

MS sent some dried prawns to the public analyst for an indication of the shelf life. However his report merely stated that the shelf life was "in the right order", and since the product was not ready to eat the analyst could make no recommendations.

MS searched on the web and found that dried prawns could contain gram-positive bacteria such as coryneforms, and the genera *Staphylococcus* and *Micrococcus*, as well as fungus.

8.2 - New Zealand Food Safety Authority 'A guide to calculating the shelf lives of foods'

<http://www.nzfsa.govt.nz/processed-food-retail-sale/shelf-life/shelflife1-2-2.pdf>
(2005). 29 pages.

In researching shelf-life MS had found this helpful step by step guide, which he thought anyone involved in the scientific determination of product shelf-life should read, especially where it involves applying a use-by date. In summary the document sets out the many factors affecting shelf-life, and the various methods for calculating it. He added that it has a list of likely shelf-lives of various foods. CM also thought that this guide was user-friendly and written in plain language.

NW enquired if any officers had compared the New Zealand guidance to that produced by the Food Safety Authority of Ireland, but no-one had.

'Guidance Note 18 - Determination of Product Shelf-Life'. (2005). 44 pages.
http://www.fsai.ie/publications/guidance_notes/gn18.pdf

8.3 - Draft EC 'Guidance Document on Listeria monocytogenes shelf-life studies for ready-to-eat foods

Full title: 'Guidance Document on Listeria monocytogenes shelf-life studies for ready-to-eat foods, under Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs'. SANCO/1628/2008. ver 9.3, (26 11 2008). 36 pages.
http://ec.europa.eu/food/food/biosafety/salmonella/docs/guidoc_listeria_monocytogenes_en.pdf

CM had written a three-page summary of the draft guidance, which she handed out to those present. She included a copy of the 'decision tree showing schematically the steps for shelf-life studies', which she had found helpful. She said that the guidance was not user-friendly. RB quoted a few sentences from it.

8.4 – Discussion on shelf-life determination generally

MS knew that in practice small businesses copy the shelf-lives that their competitors use for their products, and also that they take a commercial view on what is a suitably long shelf-life.

MS thought that all businesses should at least be aware of the microbiological organisms likely to survive or grow in their products. YF went further and said that they should carry out shelf-life testing to verify the HACCP procedures for their new products.

NW summed up the view of the group that for conditional approval an initial shelf-life determination is required, and for full approval further testing is required, to verify any longer shelf-life that the FBO wants to use.

CM had asked Paul Cook of the FSA Microbiology and Hygiene Division whether shelf-life testing can be done once only. He had replied that it should be done regularly, and should be reviewed periodically, especially if ingredients, packaging, or recipes change.

CM phoned the Eurofins head of commercial testing, Martin Lewis, and ...
She made a list of suggestions on shelf-life testing ...

CM has started drafting a leaflet on shelf-life determination, and wants our in-put.

9 – Shelf-life of smoked salmon

This updates the information given to the group by AB in Jul'08, item 4.

AB told us more about the smoked salmon manufacturing establishment in his borough, from which he had learned a lot.

9.1 – Listeria monocytogenes and shelf-life studies

The Health Protection Agency's consultancy for small businesses had made an initial shelf-life determination of 21 days, but had not based this on enough microbiological samples. The FBO's laboratory had simply tested the food for the presences of Listeria over 21 days, rather than determine whether 21 days was a safe shelf-life.

The second shelf-life determination used many more samples, and involved 'challenge testing' with Listeria monocytogenes. The FSA wanted copies of all the test results, (but have not reported whether they are now satisfactory).

9.2 – Clostridium botulinum, verifying salt concentration, and statistical confidence

To prevent the growth of *C. botulinum* in chilled vacuum-packed foods, the FSA standard for salt concentration in the aqueous phase throughout the food is 3.5% minimum.

FSA 'guidance on the safety and shelf-life of vacuum and modified atmosphere packed chilled foods with respect to non-proteolytic *Clostridium botulinum*'.

<http://www.food.gov.uk/multimedia/pdfs/publication/vacpacguide.pdf>

However, after the second shelf-life determination AB found that the salt concentration in some verification samples of salmon was under 3.5%. He served a Remedial Action Notice requiring the shelf-life to be reduced to 10 days maximum, (as recommended in the FSA guidance), until the salt concentration was 3.5% in all samples.

The fat content of salmon varies a lot, so the salt concentration varies a lot also throughout the product. AB asked the FSA how the FBO could ensure the 3.5% in all samples. The FSA advised taking a sufficient number of samples to give a 90% confidence (that the salt concentration is 3.5%), or increasing the salt concentration. AB considered this 90% was too low and has required sampling to achieve a 95% confidence level. AB used an on-line tool to calculate this confidence. AB withdrew the notice once enough samples had been taken to verify a new salting regime. The business is now adding an average 7% salt in order to 'guarantee' 3.5% minimum, in the salmon.

AB realises that he needs more training on sampling statistical confidence, and is trying to get books on the subject. He sent an EHCnet message requesting advice on the subject from other food officers, but did not get any reply.

(3.5 % salt does not prevent the growth of *Listeria monocytogenes*, AB said. It can survive in heavily-salted products).

10 – Sampling frequency in Approved establishments handling small quantities of minced meat and meat preparations

NW advised that he had been forwarded an email, via Nigel Watson of Lewisham, from Liz Stretton of the FSA Meat Hygiene and Veterinary Division. In this email Liz had given such a clear, concise answer to the question of sampling frequencies that NW read it out to the Group.

“Although it is not defined in the legislation, the Meat Industry Guide (Part 3, Chapter 2 - Microbiological Criteria) advises that for establishments producing minced meat, meat preparations & mechanically separated meat, the weekly frequency does not apply to small quantities - establishments producing an average of less than 2 tonnes a week of product intended to be eaten cooked are considered to be small quantities and when justified on the basis of a risk analysis and consequently authorised by the competent authority may be exempted from the sampling frequencies given in Regulation 2073/2005 as amended by Regulation 1441/2007.

As there is no statutory testing required for these manufacturers of small quantities of minced meat, meat preparations or mechanically separated meat, you should agree with the food business operator a sampling frequency on risk and the type of products involved.

All establishments producing products intended to be eaten raw or undercooked irrespective of production volume must undertake weekly testing.”

However KF contrasted this with the advice that Tracy Smith of the FSA Food Safety, Hygiene and Microbiology section had given to an officer in R B Kingston. This concerned a Korean restaurant which serves a dish containing raw minced meat. Her advice was that testing by the caterer was not necessary. The relevant paragraph of her e-mail, (forwarded to the editor after our meeting), reads:

All food business operators, including caterers, have to apply with the requirements for Regulation 2073/2005 (as amended) but it is not always necessary to sample and test to demonstrate compliance, particularly for caterers. This may be demonstrated using other approaches, or through their food safety management procedures supported by control of raw ingredients, (including implementation of ingredient specification and supplier audit, if this is appropriate). In our experience it would be highly unusual for a small, independent restaurant to carry out micro testing and sampling.

11 - ComBase (free-of-charge predictive microbiology software) - Training for food officers

11.1 – Introduction to ComBase

<http://www.combase.cc/>

Several officers present (RB, CM, AB, PB, KF & NW) had attended the recent FSA introductory training on ComBase. NW briefly summarized it.

ComBase is the product of an international consortium, including the FSA and the Institute of Food Research. It contains thousands of databases of research data on the growth of specific microorganisms in specific foods under specific conditions, submitted by various laboratories and checked by the ComBase experts.

To start with, the researcher requires basic physico-chemical information on each product to be examined: pH, salt concentration, (and preferably water availability). Then he or she needs to know which specific pathogenic or spoilage microorganisms are of concern in each product.

The researcher then uses the ComBase Predictor to search the data it contains, to predict the growth of the microorganism in the product he or she is examining. ComBase can provide a quick, cheap prediction of the growth of microorganisms in the product, and so to give an initial shelf-life determination. It does have limitations, eg, the researcher must be competent to interpret the predictions.

11.2 – Officers' experience of ComBase

RB told us of an establishment in his borough which manufactured fishery products, some of which were found to contain *Listeria monocytogenes*. Which of the many types of food produced should the FBO withdraw from the market? He obtained from the FBO information on the various types of foods: pH, presence of preservatives, and shelf-life used. RB looked for those foods which had neither a low pH or preservatives, and found various foods including those containing egg mayonnaise. He used ComBase to predict the growth of *L. monocytogenes* in each food up to the end of its shelf-life, and from those results told the FBO which foods to withdraw from the market. He did this in conjunction with microbiological testing to check the ComBase predictions.

AB said that he had also used ComBase to predict the growth of *L. monocytogenes* in smoked salmon, but found that it predicted that *Listeria* would grow, whereas the microbiological test results showed no growth.

RB thought that Coca Cola was intending to reduce the amount of preservatives in their drinks, and to use ComBase for preliminary predictions of microbial growth before undertaking microbiological tests.

12 - Election of post-holders in the Group

MS informed the group that he was moving from Food to Health and Safety at L B Barnet, and was therefore not able to continue as a Joint Co-ordinator of the group. NW thanked him for his

considerable support to the group and to him personally. He had been in the group since its start in 2001.

Co-ordinator's footnote. MS was the person who had recommended to Andy Bowles that he used our group's 'Flow diagram to determine if approval is needed' and to make an on-line version of it. The result a few weeks later was the ABC Courses 'Approval Determinator', which has proved remarkably popular with food officers nationally.

NW asked for expressions of interest in the posts of Co-ordinator, Information officer, & Minute-taker. In particular NW asked if any officer was willing, as an Information officer, to look out for new information relevant to approvals, eg, on the LACORS news and EHCnet e-mails. However no-one present volunteered, so it was agreed that NW and KF would carry on in their current roles.

13 - Training on the Approval of Food Establishments

NW said that he had held his third whole-day seminar on approvals for food officers on 6 March, in Westminster, for the South East London Sector Food Liaison Group. He was due to hold the next one in Lewisham at the end of the month. He had found from experience that a trainer has to spend a lot of time preparing what he is going to say, so that he can express it simply and clearly.

14 – 'Handling Business Requests for Flexibility in the use of Approval Numbers' - FSA letter ENF/E/09/001

Letter from Catherine Bowles, Food Hygiene Legislation Strategy Branch. 06/01/2009.
<http://www.food.gov.uk/multimedia/pdfs/enforcement/enfe09001.pdf>

NW read an excerpt from this letter:

"While the Agency cannot condone manufacturers/handlers using approval numbers other than those specifically linked to an establishment, except in very extreme circumstances, comments are welcome. Information gained from enforcement authorities could form the basis of a case to the Commission for amending the legislation to provide a measure of flexibility.

If you have any queries concerning this interpretation of the legislation, or indeed any further comments that you would like us to take forward to the Commission, please contact Carol Gardner (Food Hygiene Legislation Strategy Branch).

RB said that major manufacturers do switch production to another manufacturing site when problems occur at the first site, in order to maintain production. They use the food labels for the first site, which therefore bear the wrong approval code. Food authorities commonly ask other authorities for 'indulgencies' for a short period until the problem is resolved. The main concern is over maintaining traceability, but he considered that the existing practice is acceptable so long as the actual site could be traced. CM agreed that the FSA should recommend that the EC amends the law.

Action – RB volunteered to draft a response on behalf of the group.

15 - Can 'premises' have more than one 'establishment'?

See also the minutes of the meeting in May'08, item 8, and Sep'08, item 14.

LP reiterated what was discussed at the recent seminar on Approvals (at Westminster). One premises was occupied by two businesses which were using the same managers, staff, facilities and equipment. As each business was legally a separate body, most officers then formed the view

that there were two 'establishment' at the one premises, although some disagreed. An officer would have take care to serve a notice on the right establishment, eg, on the right limited company.

An 'establishment is defined as 'any unit of a food business', (Reg 852, article 2(c)). AB added that an establishment is based at a single premises.

16 - Caviar - re-wrapped, and from untraceable sources

LP told us that police from the National Wildlife Crime Unit had visited an establishment in Westminster yesterday with two food officers. They were investigating where re-packaged caviar had come from. 'CITES' labelling is enforced by Animal Health and the police, and food traceability generally by food authorities. (The CITES label must state the country of re-packaging of endangered species). LP asked if any officers had come across caviar re-packaging. She handed out a leaflet produced by Westminster C C entitled 'Caviar: the facts'.

Date of next meeting: Tuesday, 19 May 2009, 09:30 – 13:00, Walbrook Wharf offices, EC4