

London Food Co-ordinating Group's Approvals Sub Group

Minutes of Meeting held on 3 September 2009

City of London offices, Walbrook Wharf, EC4

Food authority	Officer attending	Apologies
Barking & Dagenham		Hope Robinson
Brent	Fiona Inston	
Croydon		Brian Griffiths
Enfield		Rob Bartlett
Hackney	Nigel Whiteley (Chair)	
Havering		Andy Bourlet
Islington		Carole Milligan
Kingston	Keith Fowler (Minutes)	
Lewisham		Paul Magrath
"		Ken Giles
"		Nigel Watson
Merton	Pip Barnes	
Redbridge	Henry Katsande	
Sutton	Jenny Winslet	
Waltham Forest	Pip Broad	
Wandsworth	Peter Reddell	
Westminster	Laura Parrott	
Chelmsford		Roy Perry
Tendring		Diane Thorpe

Items:

- 1 – Approvals Group meeting 29 July 2009 – matters arising
(Item1) – The work of the Meat and Livestock Commercial Services Ltd, and their Design Manuals on cutting plants.
- 2 – HACCP for meat producers and butchers – what documented procedures and training have officers found appropriate?
- 3 – Food Authority files of manufacturing and/or approved establishments
- 4 – Inspection checklists and forms for manufacturing and/or approved establishments.
- 5 - Establishments making bakery products etc from raw eggs - do they require approval?

1 - Approvals Group meeting 29 July 2009 – matters arising

(Item1) – 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 commented that the main topic of the presentation had been on design of production plants, whereas food officers were more interested in the development of HACCP-based procedures and associated training. However he said that the presenters gave us a good insight into their work, and of how much the meat industry has changed.

NW asked for views on the presentation, and read out excerpts from some e-mails between him and Martin Palmer, (inserted below, indented).

(Item1.4) MLC SL Design Manuals on cutting plants and processing plants

NW said that the Design Manuals show good practice. They are mainly for FBOs (and presumably their surveyors or builders) who are converting the premises (eg, barns) to bring them up to the standard for approval by the Veterinary Meat Hygiene Advisors (VMHA).

NW had written to Martin Palmer -

Your presentation on the Meat Plant Design Manuals

One thing we would have liked to have seen was a copy of the manuals themselves. ... You mentioned at our meeting that you might be able to send me copies of the design manuals, ... If so, I could pass them around to other officers in the Approvals Group, (although I am keenly aware of copy-write restrictions).

Martin Palmer had replied to NW -

Access to Manuals

We are currently exploring putting them on the MLC SL web site - www.mlcsl.co.uk, in a PDF version that can be downloaded for a reduced fee (suggested around £20) - I will let you know when this is available

(Item1.6) - Possibility of producing shorter manuals for butchers on meat plant design and HACCP

NW had written to Martin Palmer -

Thanks also for offering to explore the possibility of producing shorter guidance for butchers, eg, on HACCP. What food officers want butchers to use are simple HACCP-based procedures.

Martin Palmer had replied to NW -

This is the area which you said that EHO's needed the most help/guidance on, and where our Design Manuals, a revamped but easier to read version of the old MLC HACCP manual for butchers (or perhaps a combination of the two specially produced for EHO's for them to consult and to refer small meat preparation facilities to, would be a great help. It is possible that EBLEX [part of the Agriculture and Horticulture Development Board] may be interested in supporting the production of such (which we could undertake), but I wonder if such as FSA would also be willing to support this, if so it would be far easier to devote the resource to help fulfil your needs.

NW asked officers if they knew of a Division at the FSA which could fund such production. Some suggested the Meat Hygiene and Veterinary Division.

(Item3) – Cold stores and other establishments used for the cold storage and transport of PoAO for wholesale supply – an interim reply from FSA

NW advised that he had replied to Liz Stretton, FSA, thanking her for the interim reply received and asking for a fuller response to the points he raised. He received a reply from Rosalind Glover of the FSA stating:

'I have had a look at the questions you and others have posed together with the legislation and I am seeking a legal view.'

Officers responded by saying that what we would like from the FSA, in addition to a legal view, is a practical view from the FSA officials who write the guidance for food authorities and businesses, (the enforcement letters, Practice Guidance, Meat Industry Guide, etc).

KF said that a number of food authorities are still holding back on determining whether the establishments used for cold-storage and transport in our areas require approval until we have clearer guidance from the FSA on the matter.

Action - NW to reply to Rosalind Glover seeking a fuller response. [NW sent it on 03/11/2009]

(Item 5) Training on the approval of food establishments, and on the Audit of HACCP systems – updates

Training on approvals

NW said that his managers were reviewing the arrangements that had allowed him to provide this one-day training as an employee of L B Hackney, therefore he was uncertain if he could run any further seminars.

FI said that in the Manchester area the only trainer on approvals was Andy Bowles of ABC Food Safety.

Training on the audit of HACCP

JW said that 50 officers had booked for the training tomorrow by Andy Bowles.

NW said that the FSA are running further courses on HACCP, and KF added that the FSA were designing a HACCP course to take account of the recommendations made in the Pennington Report. The Agency were then going out to tender for training a organisation to deliver the course from November.

2 - HACCP for meat producers and butchers – what documented procedures and training have officers found appropriate?

NW said that following the MLCSL presentation in July he was still unclear as to what documented HACCP-based procedures and training are still available, and so researched the matter further. [JI had informed us back in May about the MTC manual and training].

2.1 - Meat Training Council (MTC) ‘HACCP Review and guidance manual for retail butchers’

NW read out excerpts from the MTC website. FI said that she had purchased a copy of this manual for the information of food officers in Brent.

<http://unix3.nildram.co.uk/~mtcunix/links/Review%20Guide%20order%20form.pdf>

The HACCP Review and Guidance Manual is available to purchase separately at a price of £45.50.

This publication enhances the training already received under the MLC [Meat and Livestock Commission] managed Meat Managers Hygiene and HACCP accelerated HACCP programme, and will enable you to further understand the validation and review procedure. It can also be bought as a stand-alone manual to help you to implement and manage a HACCP system within your business.

Contains:

- A CD with blank HACCP template, monitoring documents and cleaning schedule forms for you to download, complete and print off from your computer.
- Blank Master documents to photocopy for those without access to a computer.

For more information contact: Mary Fisher: 07917 133208. Email: mary_fisher@meattraining.org.uk

2.2 - Meat Training Council ‘Butchers’ Hygiene and HACCP Courses’

NW turned to the training of butchers on HACCP, and read out some more excerpts from the MTC website.

<http://unix3.nildram.co.uk/~mtcunix/courses.htm>

A MTC certificate of attendance would be awarded to candidates free of charge. Cost is inclusive of one copy of the publication 'HACCP Review & Guidance Manual for Retail Butchers' which includes the CD with all the word documents needed to produce your HACCP plans.

If candidates have had previous, adequate, hygiene training, then they could opt for completion of a test paper and HACCP case study to gain the MTC (Meat Training Council) accredited Meat Managers Hygiene & HACCP training course certificate. An additional charge of £25.00 + vat would be charged for each candidate who takes this option to cover the awarding body fees.

The cost of the training will include a HACCP Review and Guidance Manual and is as follows:
- Training for up to 4 delegates, [to quote one example].

Fixed price £400, plus £25 per candidate for registration and certification, plus related expenses

2.3 - FSA 'Meat Plant HACCP Manual' and 'Food safety management Diary for meat producers'

- FSA 'Meat Plant HACCP Manual' (and CD-Rom). NW showed officers this manual, which the FSA had produced back in 2002. No-one else present had seen it. NW outlined the main contents, which were mainly for slaughterhouses, and said that the purpose of the manual appeared to be for training. PB thought this manual was too complicated for butchers.

- FSA 'Food safety management Diary for meat producers'. NW said that the diary was copied from the one in 'Safer food, better business' with some additional monitoring sheets. PR remarked that he liked the simplicity of this diary.

- The FSA website portal '[HACCP in Meat Plants](http://www.food.gov.uk/foodindustry/meat/haccpmeatplants/)': includes both the manual and the diary.
<http://www.food.gov.uk/foodindustry/meat/haccpmeatplants/>

2.4 - What guidance and training on HACCP for meat producers and butchers do officers recommend?

A retail butcher and doner kebab manufacturer

NW described a Turkish butchers shop in Hackney which had been making a lot of doner kebabs in the basement and supplying them to other retail establishments. A food officer in Leicester had informed him that some of these doner kebabs had been supplied to a business in his city. NW had stopped this supply outside the 'local' area by service of a remedial action notice. The more difficult part was to find evidence that the supply of doner kebabs and meat to other retail establishments was more than a marginal part of the butcher's business. He attempted to do this by checking a number of invoices of meat received, and meat supplied, but he could not prove that the butcher was committing an offence of operating without approval.

PB pointed out that the "marginal, localised and restricted" exemption was difficult and time consuming to determine in practice. However NW held that the checking of invoices for this data could be a fairly simple procedure.

NW was going serve a hygiene improvement notice on the butcher requiring him to write and use HACCP-based procedures, and also to ensure that the managers are trained in HACCP. With this example of a retail butcher and doner kebab manufacturer in mind, NW asked officers what guidance on HACCP and training should he recommend to the butcher and manufacturer (in a letter accompanying his notice)?

Consultancy services for small businesses

JW said that Leatherhead Food Research provided an advisory service for small businesses at a reasonable cost, and so does the Health Protection Agency (HPA).

- Leatherhead Food Research - www.leatherheadfood.com
- Health Protection Agency Business Development Department - www.hpa.org.uk/webw/HPAweb&Page&HPAwebAutoListName/Page/1158313434342?p=1158313434342

Trade Association for doner kebab producers

NW asked officers if they knew of any trade association for doner kebab producers, who might have produced model HACCP plans for their members. FI replied that she thought there was one in the Manchester area, but it had not made any guidance generally available.

Biltong producers

JW thought that supplementary guidance was needed for the productions of meat products such as biltong (dried meat). PR added that he had detained two batches of biltong due to *Staphylococcal aureus* contamination, following a food poisoning outbreak in Wandsworth which was assumed to have been caused by biltong.

Form for small businesses

PR said that he had drafted a blank HACCP form which officers in Wandsworth give to small businesses requiring approval, for them to set out their own arrangements to meet the standards for approval, and their assessment of the business's procedures. The FBOs should return the form to the officer, to give him or her a clearer understanding of how the business operated. PR said that the best submission he had come across was one written by an accountant for a fish processor.

3 - Food Authority files of manufacturing and/or approved establishments

3.1 - The order of contents of food authority paper files

FI introduced her List of Contents of files of approved establishments, which was forwarded to all in the group on 28/08/2009 by NW, (annexed to the draft agenda). She had used her list of file contents in Salford, and had introduced it to L B Brent. It had been produced by the Greater Manchester Food Liaison Group, and was a development of the one in the Food Law Practice Guidance, (in Annex 12).

The introduction in the Practice Guidance states:

The following guidance is offered to Food Authorities in order to support and improve consistency in the content and structure of files produced for establishments which require formal approval.

A properly structured file containing all the relevant information is important to the Food Authority. It provides a history of the establishment concerned and how it has developed; it provides continuity for new officers; it facilitates monitoring exercises and will assist the Food Authority in demonstrating its competence.

Both FI and PB had a lever-arch file for each approved establishment. (FI told us that there were ten approved establishments in Salford, compared to forty in Brent).

PB agreed with the benefits of having a structure to approved establishment files, and had drafted a list of file contents (similar to the one FI had produced) and put one in each file, prior to the FSA audit of L B Merton (earlier this year). This arrangement of files had received favourable comments from the auditors.

3.2 - How officers use the information in the paper files

FI informed us that at Salford officers needed to spend a few hours looking through the paperwork prior to an inspection, and often took the file with them. (She said that the arrangements in long-standing manufacturing establishments are fairly static). FI said that the file content and structure allowed EHOs to get a good knowledge of the establishment before visiting, and made it easier to detect any changes since the last visit. She added that structure to a file was important, particularly when information was needed quickly, as in a product withdrawal. PB confirmed that officers at Merton liked the structured arrangement of the files, as it allowed quick access to information.

FI had useful plans of equipment layout. JW added that auditors like the inclusion of photographs of the equipment. PR remarked that at Wandsworth officers had decided to concentrate on the establishment's documented HACCP procedures and supporting documentation.

NW said that L B Hackney is going to scan the premises files and save them on the computer as a single pdf document for each establishment. This would overthrow the way he had structured the paper files of the manufacturing establishments he was involved in.

3.3 - Keeping the food authority files up to date

PR seriously questioned the practicality of keeping our files up to date. He found that the officer becomes a filing clerk, having to collect updated copies of all the business documents. This becomes a big exercise, because files quickly became out of date. However he recognised that well-ordered files are good for showing to auditors. Discussion took place on the merits of spending time on keeping our files up to date compared with auditing the procedures in use at establishments. It was generally considered that file maintenance was important and portrayed a professional image, while it was recognised that this should not overly distract from the inspection of food premises and documents.

NW told officers about a lengthy and detailed Factory Inspection Record 'Summary sheet of file contents' produced by an officer at West Wiltshire DC, with 50 rows for all of types of documents, and the dates the documents were placed in the file. The officers present thought that it was excessive, and not all the documents were necessary for the inspections.

3.4 - Food Authority computer files in a paperless office - the practicalities in Westminster C C

NW then asked about other officers' experience of using only computer files, and no paper ones. LP replied that at Westminster paper documents were scanned by the 'project team' and linked to electronic files. The paper documents were then stored off-site, but were retrievable within 24 hours. However it was difficult for officers to get an overview of the establishment's history. There were also delays in scanning, and retrieval was flawed: sometimes the wrong papers were provided. Once the new paper documents had been scanned, they were noted on a spreadsheet, and put together with the old ones in an archive box.

4 - Inspection checklists and forms for manufacturing and/or approved establishments

4.1 - The four forms examined and discussed

Four inspection forms were examined or referred to. The last three were forwarded to all in the group on 28/08/2009 by NW.

- LACORS 'Inspection Form(s) for general food hygiene of Manufacturing establishments &/or establishments requiring approval'

<http://www.lacors.gov.uk/lacors/ContentDetails.aspx?id=7819&authCode=3277468>

(31 pages). See item 4.2 below.

- 'Inspection Form for Food Hygiene of Manufacturing / Approval establishments'
A modification of the LACORS form, from PB for L B Merton. (26 pages). See item 4.3 below.

- 'Inspection checklist and Report on the establishment, for manufacturing and wholesale food establishments'

Written by NW. (8 pages). See item 4.4 below.

- 'Food hygiene / standards inspection form / aide-memoire for manufacturer or approved premises where a full inspection form has already been completed'

Written by PB for L B Merton. (6 pages). See item 4.5.iii below.

JW suggested that offering a range of forms could help officers by suiting the type of establishment they were due to inspect, and to suit their personnel preference. However PR said that Wandsworth had opted for uniformity through using a standardised form.

4.2 - LACORS forms for the EC hygiene regulations

NW said that in 2005 he had written an inspection form for manufacturing establishments, which included the new EC hygiene regulations. (He had done this work when on secondment to LACORS). However there had not been sufficient time for anyone to actually use the form before it was put on the LACORS website, and he had not revised it since 2005. (He had written two other inspection forms, one on Minced meat & meat preparations, and the other on Meat products, which are also on the LACORS website).

NW asked if any officers had used the LACORS form for manufacturing establishments, and PB, FI and HK replied that they did. NW said that personally he did not like it because it does not follow closely enough the way officers actually carry out inspections. PB found the LACORS form too long and repetitive, although her officers have use it.

4.3 - L B Merton's Inspection form for manufacturing establishments

PB introduced her version of the LACORS form. She explained that she had changed the layout of the LACORS form to put the key information at the front, and added some extra space for officers to write in. She added that Merton's inspection forms were not copy-typed afterwards, so using them again at the next inspection would be difficult.

4.4 - 'Inspection checklist and Report on the establishment, for manufacturing and wholesale food establishments'

NW said that he was no longer using the LACORS form, and has developed over the last four years an entirely new form, which is essentially a checklist, (on 8 pages). He writes most of his notes on lined paper, and some on this checklist, and then types them up on return to the office. This takes time, but in this way he builds up over the years a report on the establishment which clearly set out what the establishment did, which is very useful for subsequent inspections. PR concurred. NW added that the report can also list the authority's copies of the establishment's documents. NW then briefly explained his new form. It enlarged on the Overview contained in the LACORS form, but did not contain the detailed legal requirements. It also includes a single-page checklist for approved meat products establishments.

4.5 - What forms to use at the next inspection

NW had asked some officers from around the country what forms they used for the next inspection. (The officers were attending a LACORS meeting back in 2005 on drafting inspection forms for approved establishments).

In summary the officers present at the Approvals Group meeting knew of or used one of four methods:

- i - Reuse the first full form, and write on it. (An authority in north England. See below).
- ii - Type the first full form, and write on it. (FI. Also NW, see item 4.4 above).
- iii - Use a new simpler form. (PB. See below).
- iv - Use just two columns on lined paper. (PR, see item 4.7 below).

4.5.i - Reuse the first full form, and write on it

One officer from the north of England told NW of their ineffective way of using inspection forms for the next inspection. The next inspector used the inspection form which had been filled in by hand by the first officer, and then made more hand-written notes on it in a different coloured ink. The third officer added more hand-written notes in yet another colour. The resulting form was a mess, and difficult to read.

4.5.ii - Type the first full form, and write on it

FI said that at Salford officers typed their full inspection form for the next officer to refer to. The next officer used that form at the next inspection, and made hand-written notes on it. (See also item 4.4 above on the use of the 'Inspection checklist and Report').

4.5.iii - Use a new simpler form

None of the officers present except PB had come across a secondary inspection form. NW said that the LACORS website states (in the page on Manufacturing establishments food hygiene inspection forms) that one is still to be developed:

Download 2 (Not posted - still to be developed - suggestions welcomed) A simpler form aimed at large operators who will (or should) have robust systems in place around which the inspection can be focus on more of an audit basis.

Next inspection form for L B Merton

(Full title: 'Food hygiene / standards inspection form / aide-memoire for manufacturer or approved premises where a full inspection form has already been completed').

PB introduced her much shorter form (of 6 pages) for the next inspections after the first primary inspection. This was intended for manufacturing establishments which change little from year to year. She explained how her next inspection form included a review of the HACCP procedures, by focusing on any changes and any new products.

4.6 - The next inspection. What officers should focus on, and how a simpler form can prompt officers to check the focal points

Focused audit

In an establishment with several HACCP-based procedures, NW recommended auditing one specific product, and doing so in detail. The officer should list (eg, on the first primary inspection form, or in a separate list):

- all the HACCP procedures documented by the establishment,
- any products for which there is still no HACCP procedures, and
- which procedures have been audited by officers.

PB agreed, and pointed out that her Next Inspection form did have the provision for a focused audit on a single operation or product.

Issues for the next inspection

KF said there should be a section to carry forward issues or areas of concern from a previous inspection. HK pointed out that on the LACORS form there was space for 'Recommendations for next officer at next / secondary inspection' (on page 21), and PB agreed to include this in her revision. PR concurred this was a good point as it encouraged officers to take a longer-term view, and to prepare

beforehand for the inspection. HK reinforced the usefulness of being able to refer back to a previous inspection, and using that information to decide what the action to take at the next inspection.

JW asked if an officer considered that a FBO was not telling the truth, how could this be flagged up on the form to alert the next officer?

NW said that he marked with a bold '?' any matters which he wanted to question the FBO further on at the next inspection.

Finding changes since the last inspection

PR expressed concern that officers should delve deep enough to find any changes or issues, and to avoid simply filling in the form as the goal. PB said it was her intention to focus officer time on the inspection, and to reduce time in filling in forms and associated tasks spent in the office.

JW asked whether the form could help an officer detect, for example, the risk of botulism arising from the manufacturer reducing the acidity in 'yogurt with hazelnuts'.

Action - PB said that she would revise her 'next inspection' form taking on board the Group's comments. [Her revision was forwarded to all on 03/11/2009 by NW]

4.7 - Lead assessors form

PR told us that when he was undertaking Lead Assessor training the advice given him was to use a 'blank sheet', to ask questions, and to record the answers. The auditor should not be led by the inspection form. He felt this was a more investigative approach. The information collected varied according to the issues relevant to the individual businesses.

He said that the Lead Assessor form has only four columns:

Ref. Area or Item	Question Observation Hazard	Answer Response Control	Action Informal / Formal / Verbal / Letter / Imp.Notice / Prohib.Notice
	<i>What did you see? What did you ask?</i>	<i>What answer did you get?</i>	<i>What did you require?</i>

5 - Establishments making bakery products etc from raw eggs - do they require approval?

PB enquired if establishments which cooked cakes made from raw eggs for wholesale supply require approval. KF replied: legally, yes.

NW agreed, but added that he had received a reply to this question from Simon Petty of the FSA's Primary Production Division a year ago, which stated that it was not the intention of the EC or the FSA to require approval of bakery products. Excerpts of his e-mail read:

'Eggs broken out of shell or liquid egg are not processed products, so as the law stands a bakery product or similar containing them could be considered to be an egg product and thus subject to Regulation 853/2004.

In the Commission's review of the food hygiene legislation, this has been identified as an issue which needs to be resolved, since it was not the intention for the use of eggs in foodstuffs to render the food subject to the requirements for egg products. Certainly, the Agency has no intention to seek that approval be required in such cases.'

Date of next meeting: Wednesday, 4 November 2009, 09:30 – 13:00, Walbrook Wharf offices, EC4