

**Minutes of Meeting held on 26 January 2010**  
City of London, Walbrook Wharf offices, EC4

<b>Food authority</b>	<b>Officer attending</b>	<b>Sent apologies</b>
Camden	Sayer Galib	
"	Eileen McGroary	
Croydon		Brian Griffiths
Enfield		Rob Bartlett
Hackney	Nigel Whiteley (Chairman)	
Havering	Andy Bourlet	
Hounslow	Juliet Isitt	
Islington		
Kensington & Chelsea	Matthew Morris	
Kingston	Keith Fowler (Minutes)	
Lambeth	Mohammed Suleman (MSu)	
Lewisham	David Singleton (agency)	
Merton	Dawn Kitson	
"		Pip Barnes
Redbridge	Henry Katsande	
Richmond		Karen Alvey
Sutton	Jenny Winslet	
Wandsworth	Peter Reddell	
"	Ira Bertin	
Westminster		Laura Parrott
Brentwood BC	Mark Stanbury (MSt)	
Chelmsford B C	Roy Perry	
Tendring D C	Diane Thorpe	

**Items**

- 1 - Approvals Group meeting on 4 November - liaison with Veterinary Officers on dealing with meat establishments subject to approval - matters arising
- 2 - Approval of small catering butchers establishments - as cutting plants, or re-wrapping establishments, or cold-storage and transport establishments?
- 3 - The standards for conditional approval - the different standards used by VMHAs and food officers
- 4 - Animal by-products control procedure
- 5 - London Food Co-ordinating Group meeting on 11 November - report from the Approvals Sub Group
- 6 - Sharing expertise in inspecting approved establishments - a Memorandum of Understanding between food authorities in Kent
- 7 - High Court judgement on what is an 'establishment' and whether a new owner must apply for approval
- 8 - Refusal to grant conditional approval - may the establishment continue to operate for a limited period?
- 9 - Training on Approvals - updates

**1 - Approvals Group meeting on 4 November 2009 - liaison with Veterinary Officers on dealing with meat establishments subject to approval - matters arising.**

See the minutes, and presentations from Joaquim Ferre, Veterinary Meat Hygiene Advisor (VMHA), sent on 08/01/2010 by NW.

(Item 1.6.iv). Meat Hygiene Service Approvals Team

JW told us that the Meat Hygiene Service (MHS) Approvals Team has recently taken over from the FSA the tasks of assessing cutting plants etc for approval, advising FBOs, and of granting or refusing approvals. The Approvals Team office is located in York. The VMHAs are now called 'Veterinary Managers'. Joaquim Ferre is no longer the VMHA for the London area.

MHS Approvals Team. (Part of the Veterinary and Technical Directorate).  
[approvals@mhs.gov.uk](mailto:approvals@mhs.gov.uk) Veterinary & Technical helpline. Tel: 01904 456182.

(Item 1.6.1v) Communications with the MHS

JW raised the issue of delays by the FSA in dealing with approvals. NW pointed out that Lawson Wood, a MHS Lead Veterinarian, had acknowledged these problems at his presentation to our group on 19 November 2008. He wanted dialogue with us and has come to two of our liaison meetings. JI told us of a catering butcher's establishment requiring approval that she had referred to the FSA back in 2005, which took until 2009 for the FSA to grant approval. She inspected it over the five year period, and asked at each visit whether the FSA had yet granted approval. She got complaints from EHOs about cut meat being supplied from there to other establishments without identification marks. It was generally felt there had been a lack of information from the FSA on the progress of individual establishments requiring approval.

AB told us about the site-meeting he had had with two VMHAs, (LW & CM), which he had found instructive. However JI said that she wanted to accompany a VMHA on a visit, but he assessed the plant without her. The general view held at our meeting was that we should inform the MHS of meat establishments requiring approval by them, and should continue our routine interventions there, until the MHS takes a decision to grant or refuse approval. AB and JI suggested that we should leave the task of advising FBOs to the veterinary officers.

(Item 1.4) Visit to Smithfield Market

NW mentioned that the Veterinary Officer at Smithfield, Mike Seton, had offered to show him and a few other officers around the market early one morning, for which there was a show of interest from those present. (However MS had not replied to NW's e-mail accepting his offer).

(Item 1.5) Meat delivery vans

NW also asked if any officers had received referrals or enquiries from the City of London on the registration of meat delivery van 'establishments' (ie, establishments where the vans are normally kept). AB was the only officer present who had had such a contact, a phone call.

DVLA checks on meat vans. MM said the Driver and Vehicle Licensing Authority (DVLA) procedure for giving information to LA officers was a slow one. He enquired if any officers had access to the DVLA through quicker routes, such as the police, who can get a response in seconds. MM and JI knew of an application form used by Trading Standards for this information. MSu informed us of an occasion when he had got a quick DVLA check done with police assistance, because he had linked the incident to a crime. JW said that most LAs have an (electronic?) link to the DVLA database, normally by an officer dealing with untaxed vehicles. This could be a point of contact to get driver and vehicle registration details quickly.

## **2 - Approval of small catering butchers establishments - as cutting plants, or re-wrapping establishments, or cold-storage and transport establishments?**

See the minutes of our meeting on 4 November 2009, item 1.2.i, and the 'Catering butchers exemption flowchart' in the presentation given by Joaquim Ferre, VMHA.

NW said that he had met Joaquim Ferre (JF), the VMHA, at a small catering butchers shop. JF's opinion was that this small retail establishment cut less than 2 tonnes of meat a week, and therefore was exempt from approval by the FSA as a cutting plant. However NW considered that the establishment still required approval by the food authority for other activities, namely re-wrapping meat, and cold-storage and transport. NW's reasoning was that the supply of fresh meat from the

catering butchers shop to other retail establishments is both more than a quarter of the business, and is also more than 2 tonnes per week, which is more than a 'marginal' supply. (The Food Law Practice Guidance, A.5.4.2, defines 'marginal' in terms of the amount of meat supplied, not the amount of meat cut). NW had written to JF and to Lawson Wood on this discrepancy.

JW agreed with NW that meat businesses do have a mixture of different activities, such as cold storage, re-wrapping and cutting, and that we should therefore inform FBOs right from the start that their establishments may require approval from us.

Jl had come to a similar conclusion about a small cutting plant in Hounslow, where the consultants CMi had advised that the establishment was exempt because it cut less than 2 tonnes per week. They overlooked the fact that there were no retail sales, and therefore the 'marginal, localised and restricted' exemption does not apply to non-retail establishments.

Both Jl and NW had found the Meat Industry Guide useful in giving worked examples of retail establishments with sizeable supplies to other establishments which are exempt, (in Part One, ch 7).

### Approval of establishments which both store cold and transport

NW reminded the group of an outstanding query with the FSA since May 2009, seeking confirmation on the approval or exemption of a variety of cold stores and other establishments which both store cold and transport products of animal origin. Although the FSA had referred this to their legal section he had not yet received a response on this complex matter. DK asked if the officers present would approve such storage and transport establishments before receiving a response from the FSA, and the general reply was not to, but just to check for compliance with the specific temperature requirements in Reg 853/2004.

NW reminded officers that the FSA had decided that approval was not required for 'retailers distribution centres', (even though he and others maintained that by law they are not exempt). See FSA letter ENF/E/08/036.

## **3 - The standards for conditional approval - the different standards used by VMHAs and food officers**

See the minutes of our meeting on 19/11/2008, items 9 and 11, 29/01/2009, item 1(11), when we first discussed these standards, and 04/11/2009, item 1.3.

### 3.1 - The standards for HACCP-based procedures used by VMHAs, and Standard Operating Procedures

Jl said that she had raised this issue of the different standards used by VMHAs and food officers because it appeared to her that VMHAs were prepared to grant Conditional Approval to cutting plants where HACCP-based procedures were not properly documented.

Jl read out the standards which Joaquim Ferre, VMHA, showed us in his presentation on 04/11/2009:

When conditional approval may be granted?

- If the plant does not have a recognisable HACCP plan, as long as controls are in place to manage risks to public health whilst such a plan is implemented.
- When there are structural, equipment or operational deficiencies, if deficiencies are being managed such that risk to public health are being effectively controlled.

NW referred to what Charlie McLean (CM), VMHA, had told us on 19/11/2008, (which appeared to be somewhat higher than the standards used by JF):

For Conditional Approval, he requires standard operating procedures (SOPs) to be in place, and a HACCP plan with critical control points (CCPs) that are meaningful to him, with practical checks, and documentary evidence that the CCPs were being controlled in practice.

In his presentation, CM had shown us a slide which stated:

Conditional approval: establishment is not fully compliant but food safety risks are being adequately managed and the operator is taking steps to implement permanent solutions.

Standard Operating Procedures. (SOPs). NW pointed out that the VMHA CM put great emphasis on documented SOPs, eg, for removing the spinal column, and producing minced meat. PR thought that VMHAs interpreted 'HACCP based procedures' more widely to include SOPs, and not just as procedures following the seven HACCP principles. NW asked officers if they would accept just documented SOPs for conditional approval of establishments handling low risk foods, and the consensus was yes.

### 3.2 - The standards for HACCP-based procedures used by food officers, and the term 'infrastructure'

NW quoted from the Food Law Practice Guidance, (A.3.4) which he said gives a very useful interpretation for food authorities of the term 'infrastructure', because it includes HACCP-based procedures and other systems necessary to produce safe food. (This had been included in the Practice Guidance partially as a result of our group's comments to the FSA back in 2005 on their consultation on the PG).

In this context, Food Authorities should consider 'infrastructure' to relate not only to the physical structure of the establishment, but also to the systems and services necessary for the food business to be able to produce safe food. Such systems would include a procedure or procedures based on the HACCP principles in accordance with Article 5 of Regulation 852/2004.

We thought that the VMHAs use the standard in the FSA Meat Industry Guide on conditional approval, (in Part One, chapter 7), which does not include any interpretation of the term 'infrastructure'. By contrast, food officers use the standard in the Food Law Practice Guidance on conditional approval (quoted above), which interprets 'infrastructure' to include HACCP-based procedures. NW concluded that this difference in the two guidance documents has led to the difference in the standards for conditional approval between them and us.

### 3.3 - Appropriate standards for HACCP-based procedures

Discussion took place on the appropriate standards for having HACCP-based procedures in place before granting Conditional Approval. MS thought that there was not such a big difference in standards between VMHAs and food officers, provided the risks to public health were being managed.

Jl said that she had refused approval for a sushi manufacturing establishment which had not followed their own HACCP plan. (They had only been written it for the purpose of getting approval). MS agreed that it was better to have good procedures and practices in place with some documentation than a HACCP-plan which was not being followed. JW wanted to see how an establishment is operating in practice when the officer and consultant have left, before granting approval.

### 3.4 - Other reasons for the different standards used by VMHAs and food officers

Jl presumed that this difference in standards for conditional approval was also due to the VMHAs mostly inspecting establishments which handle only low risk foods such as fresh meat, which is intended to be cooked before consumption. On the other hand food officers inspect more establishments which produce high risk chilled ready to eat foods.

PR felt that the VMHAs approached the standards for approval from their extensive experience of dealing with just a few types of products of animal origin, so they were well aware of the practical

problems which need to be addressed before granting conditional approval.

### 3.5 - Restricting the shelf-life

NW said that the Approvals Group a few years ago had reached an agreement on the standards for conditional approval for establishments producing chilled ready to eat foods. We concurred that Conditional Approval should only be granted if the FBO agreed to restrict the shelf-life of his foods to the time we thought safe, or to the time indicated by any shelf-life determination which the FBO had carried out. We reasoned then that this restriction gave the FBO the incentive to carry out further testing to validate the shelf-life that he wanted, ie, to demonstrate how much longer the shelf-lives are for his products. The food authority could then grant full approval for his establishment.

Action - 'Checklist of the relevant requirements of food law which an establishment must comply with for Conditional Approval or Full Approval'. NW to revise it to include the VMHAs' practical interpretation of the standards for conditional approval, and to send it to all in the group.

[NW sent this to all in the group on 08/03/2010].

## 4 - **Animal by-products control procedure**

MSu introduced the procedure he was drafting on the control by local authority enforcement officers of animal by products (ABP). He explained that when he was in the FSA 'Illegal Meat Task Force', the number of incidents of illegal dumping of waste meat had led him to search for written procedures on the control of ABPs. He was not able to find any on the LACORS website or elsewhere. NW asked if any officers present knew of such a procedure. JW said that the Surrey C C website has information on ABPs. NW mentioned the Northamptonshire C C simplified guidance for businesses on the disposal of waste foods was on the LACORS website. MSu considered that our Group could be a good platform for developing Lambeth's ABP control procedures.

MSu outlined the legal requirements for the storage and disposal of ABPs, and gave some examples of good and bad practice that he has come across. Some other officers added a few more details. The main points which he mentioned in the procedure were as follows.

### 'Animal by-products' include

- all uncooked meat and fish which are not intended for human consumption, (including those which have passed their 'use by' date).
  - foods containing raw meat and fish, (eg, burgers), and lightly-processed meat and fish, (eg, salami).
  - packaging contaminated by blood, etc.
- (Packaging must be steam cleaned or hydrolysed before it may be disposed of as general waste).

### 'Animal by-products' do not include

- 'Former foodstuffs', (eg, cooked meat and fish).
  - 'Catering waste', which includes all food from catering establishments.
- (These foods may be disposed of as general waste and sent to landfill).

Food businesses which produce ABP. Not just butchers and fishmongers shops, but also some supermarkets and manufacturing establishments.

Food businesses which do not produce ABP. They may include:

- sandwich manufacturers, which produce 'former foodstuffs'.
  - catering establishments, and cook-chill establishments which produce 'catering waste'.
- (Some of these cook-chill establishments may require approval, NW added).

Storage of ABP. In clean, leak-proof, lidded, marked bins, away from food.

- However ABP category 3, (including scraps and trimmings), may be stored in a freezer with food until there is sufficient for collection as ABP. AB reminded us that Charlie McLean, the VMHA, had given us this advice. (See the minutes of our meeting on 19/11/2008, item 8).
- Supermarkets may arrange for their ABP to be carried to their central depot.

ABP waste carriers. MSu listed a few waste carriers in his procedure. MSt added that Vetspeed also collects and incinerates ABP, or detains it if necessary.

NW queried how to check whether an ABP carrier was registered or licensed, since the Environment Agency website simply lists the many waste carriers they have registered, without distinguishing ABP carriers from the others, (eg, scrap metal carriers).

ABP carrier records. Licensed ABP carriers must record the details of each delivery. These commercial documents must be kept by the producer, the carrier, and the receiver, for regulators to inspect, for 2 years.

Disposal of ABP. Permitted methods of disposal include rendering and incineration, and use in pet food manufacture.

Enforcement of ABP storage and disposal. Local authorities have the responsibility to enforce parts of the ABP Regulations, and these powers are usually delegated to Environmental Health and/or highways enforcement. In L B Lambeth 'Street Care' are better positioned than EH to find and deal with meat waste dumped on the highway.

- Police. MSu told us that the Police had charged people involved in fly-tipping waste meat. In one instance they found a lorry-load of meat being dumped into Wandsworth Council waste bins.

Enforcement of ABP in approved establishments. Food officers inspecting such establishments must, under Reg 854/2004, article 4, audit the FBO's compliance with Reg 1774/2002 on ABPs. NW pointed out that because of this audit requirement, one of the requirements for Conditional Approval is a satisfactory arrangement for the storage and disposal of ABPs.

Notice requiring removal. MSu inserted a notice template for the collection of dumped ABP and its proper disposal. (Copied from one produced by L B Waltham Forest).

#### Practicalities of enforcement

To check whether all the waste meat from a butchers shop is disposed of as ABP, MSu advised us to see the type of meat entering the shop. If there is a lot of bone and fat then the business must produce a lot of ABP. Then check the invoices to see how much ABP is collected by the carrier.

NW told officers of a project in Hackney two years ago to check on butchers' and fishmongers' compliance with the ABP Regs. In so doing, the officer checking this had found a lot of other problems with food hygiene, especially in some butchers shops which he discovered were supplying more than a marginal amount of meat, and so required approval as cutting plants.

Evidence for prosecution. MSu advised officers to take a sample of the ABP for presenting in court if necessary.

Websites with information on ABP. The DEFRA website on ABPs is clear, simple, and very easy to read, NW had found.

[www.defra.gov.uk/foodfarm/byproducts/index.htm](http://www.defra.gov.uk/foodfarm/byproducts/index.htm)

Action. MSu to send his draft procedure to officers attending this meeting, for us to give him our comments.

[NW forwarded this to all in the group on 01/02/2010].

## **5 - London Food Co-ordinating Group meeting on 11 November - report from the Approvals Sub Group**

NW was invited to the meeting to give an update on the work of our sub group, which was well received. He read out part of the minutes of that meeting, (LFCG, item 4).

'... NW commenced his report on current activities by describing the Approvals Group and the work it carried out. It operated independently of any other similar groups and did so remarkably well. ...'

The LFCG also discussed sharing expertise in inspecting. (See item 6 below).

## **6 - Sharing expertise in inspecting approved establishments - a Memorandum of Understanding between food authorities in Kent**

See the Memorandum forwarded on 15/01/2010 by NW.

NW said that at the London Food Co-ordinating Group meeting on 11 November, Peter Scott asked him whether our Approvals Group had arranged any sharing of expertise in joint inspections of approved establishments, (which we had not), and David Lock of LACORS immediately told the LFCG that the Kent food authorities had developed a Memorandum of Understanding (MoU) to share experience and knowledge on Approvals. The other managers at the LFCG meeting took an interest and agreed to discuss this further.

BG had suggested this very thing back in 2007, as one of the main objectives of our newly formed all-London group. He said then that the Food Law Practice Guidance, (1.2.2), encourages identifying a pool of officers within their liaison group with experience and qualifications in inspecting approved establishments and high risk activities.

NW said that the MoU was written in plain, straightforward language. It is now on the LACORS website as an example of good practice.

<http://www.lacors.gov.uk/lacors/ContentDetails.aspx?id=22766&authCode=2C84B49>

He read out two more parts of the minutes of the LFCG meeting, (item 4).

NW asked if the arrangements for sharing of information could be developed by the LFCG and ALEHM into a more formalised scheme. PS thought this might be possible but initially it could be operated informally.

ALEHM to be asked to consider formalising a scheme to share Approvals information among LA's.

NW asked the officers present for their initial comments.

JW suggested that our group could make arrangements on an informal ad-hoc basis with officers in other London Boroughs.

Jl thought that this MoU was also good for officers to gain experience and to share their knowledge. MSt added that increasing financial pressures will drive local authorities into sharing the knowledge and experience of specialist officers.

MSu suggested that a formal process could be put in place for officers to give their time to another LA, like the FSA Illegal Meat Task Force. MSt agreed. They contacted officers in a list to find one who was able to provide advice for a specific problem, so that the officers in the other authority could carry out their own investigation. (That task force has been superseded by the FSA Food Fraud Task Force).

Specialist Premises / Processes. David Lock had asked NW to mention this part of the LACORS website to our group.

<http://www.lacors.gov.uk/lacors/Liaison/DocSearch.aspx?N=4000&Ne=0+2000+3000+4000+5000+6000+7000+8000+9000+10000+11000&authcode=2C84B49&cats=11&options=-1&terms=>

NW enquired if any of the officers present with specialist processes might be prepared to share their knowledge with other food officers. He pointed out that AB has plenty of knowledge and experience of smoked salmon production, which Jl thought would be useful for her officers.

Action. NW to send an e-mail to all in the group enquiring who may be interested in volunteering to

assist other officers in other boroughs on an informal basis. Volunteers need to indicate how much they know about approvals generally, and any specific products or processes they have a particular knowledge and experience of.

## **7 – High Court judgement on what is an 'establishment' and whether a new owner must apply for approval**

See the e-mail on 'High Court case on an establishment handling fishery products without approval' sent on 11/01/2010 by NW. (Ian Andrews of L B Greenwich had informed NW of this case).

Case: Allan Rich Seafoods v Lincoln Magistrates' Court  
High Court of Justice Queen's Bench Division Administrative Court. 21 December 2009  
[EHN. 26 Feb 2010. page 20]

NW said that this judicial review and appeal case in the High Court confirmed a number of tentative conclusions that some food officers in our group had come to. The establishment concerned was a fishery products cold store which carried on operating without approval, even though the food authority had served a remedial action notice prohibiting its operations. The authority finally seized 200 tonnes of fishery products from the cold store and the Magistrates' Court condemned the lot. NW briefly read out some interesting aspects of the case.

Even the High Court judge found the law on approval to be complex.

'... central to answering [a number of questions] is a consideration of the issue of approval. That turns in part on a correct analysis of a complex web of Community and domestic law instruments regarding food law.' (para 1).

NW drew attention to the judge's interpretation of an 'establishment'.

'... the definition of establishment is clear – any unit of a food business. [Reg 852/2004, article 2.1(c)]. ... In my view establishment denotes both premises and the manner in which those premises are being used by the food business operator. Thus approval is required for a food business or unit of a food business and not merely for the premises from which the business is conducted. ... (para 45)

The judge concluded that a change in ownership of the establishment does require a new application for approval, and a visit from the food authority to determine whether to grant approval or not. He added that the Food Law Practice Guidance is incorrect on this question. (para 46). [FLPG, Annex 7, App 1, Qu 3]. He said about the case before him:

'... Here, however, there was a new food business operator, the appellant, [Allan Rich Seafoods Ltd] which like a phoenix arose from the ashes of Roland International Seafoods Ltd, albeit that its guiding mind was the same, Mr Saldanha. In my judgment, under Regulation (EC) 853/2004, the appellant would need approval.' (para 46).

## **8 - Refusal to grant conditional approval - may the establishment continue to operate for a limited period?**

NW said that this is a crucial question for food authorities who refuse to grant conditional approval.

Jl told us about an establishment which L B Hounslow had refused to approval. The FBO had appealed against the decision, and so was permitted in law to continue operating. In the meantime the FBO could make the necessary improvements and re-apply for approval.

NW informed the group that he had come across a contradiction between two regulations.

### Official Feed and Food Controls (England) Regulations 2009, regulation 12(5)

This regulation, on the Right of Appeal, appears to contradict the prohibition imposed by Regulation 853/2004, (article 4.3). Regulation 12(5) states:

Where an approval is refused or withdrawn, the food business operator who, immediately before such refusal or withdrawal, had been using the establishment concerned may continue to use it, subject to any conditions imposed by the competent authority for the protection of public health, unless — ...

(b) where an appeal against that decision has been lodged, the appeal has been finally disposed of or abandoned.

### Regulation (EC) 853/2004, article 4.3

This article states the opposite to regulation 12(5):

An establishment subject to approval in accordance with paragraph 2 shall not operate unless the competent authority has, ...

(b) provided the establishment with conditional approval.

Conclusion. NW had tentatively concluded the following, (in an e-mail to JI):

The FBO may indeed appeal against a food authority's decision to refuse to grant conditional approval, and may continue to use the establishment until the appeal has been finally disposed of or abandoned. (OFFC(E)R'06, reg 12(5)).

However if the FBO applies for approval (or reapplies), then his establishment must not operate until the authority grants conditional approval. (Reg 853, art 4.3).

One enforcement action is clear. If an officer serves a remedial action notice preventing the establishment from operating, then the FBO may not continue to use it, (OFFC(E)R'06, reg 12(6), and FH(E)R'06, reg 22(3), as interpreted in the FSA template remedial action notice Notes).

MM agreed with NW that if there is a contradiction between national law and EC law, then the EC law should take precedence.

## **9 - Training on Approvals - updates**

### 9.1 - Seminars on Approvals

NW informed the group about the fifth seminar on Approvals he was due hold next month for officers in Norfolk, organised by Fiona Inston of Breckland D C.

He had given a presentation to the London Region Food Study Group on 9 November on the subject of 'Illegally' operating meat and fish plants - how to deal with the commoner examples'.

### 9.2 - 'Approvals Determinator'

See the e-mail to all in the group, sent on 05/01/2010 by NW.

Subject: The 'approval determinator' is now on the ABC Food Safety website

Andy Bowles developed this on-line tool in 2006 using our Approvals Group's 'Flow Diagram to determine if approval is required'. The tool proved to be popular with food officers, being easy to use and well illustrated, but it is now only accessible on subscription to ABC Food Safety. ...

Introduction to the 'approval determinator': <http://www.abcfoodsafety.co.uk/home/approval-determinator>

'Flow Diagram to determine if approval is required', (9 pages):

[http://www.cieh.org/uploadedFiles/Core/Membership/Regional\\_network/London/Study\\_and\\_technical\\_groups/London\\_food\\_sub\\_diagram\\_approval.pdf](http://www.cieh.org/uploadedFiles/Core/Membership/Regional_network/London/Study_and_technical_groups/London_food_sub_diagram_approval.pdf)

(This is on our Approvals Group website:  
[http://www.cieh.org/members/London\\_food\\_subgroup.html](http://www.cieh.org/members/London_food_subgroup.html))

After sending that e-mail MC pointed NW to the ABC Courses Ltd website, which has another version of the 'approval determinant'. That version is copy-write, but it is still available free of charge.  
<http://food.abc-courses.com/approval-determinator/>

#### The differences between ABC Food Safety and ABC Courses

NW had forwarded an e-mail on 05/01/2010 from Andy Bowles of ABC Food Safety. The e-mail pointed out a statement on his website that ABC Courses Ltd has no connection with ABC Food Safety Ltd. NW explained that both offer on-line food safety training for food officers and other local authority enforcement officers, and that there is a dispute between them. Their web-addresses are:

- ABC Food Safety Ltd, (run by Andy Bowles). <http://www.abcfoodsafety.co.uk/>
- ABC Courses Ltd. <http://www.abc-courses.com/>