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# **A Review of Meat Cutting Plants and Cold Stores**

**Final report**

**October 2018**

**Food Standards Agency and**

**Food Standards Scotland**

# REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

# REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

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## Executive Summary

### Introduction

1. On 1 February 2018 the Food Standards Agency (FSA) and Food Standards Scotland (FSS) (“the Agencies”) announced a UK-wide review of cutting plants and cold stores in the wake of non-compliance issues identified at a number of cutting plants during 2017 and early 2018. The terms of reference (Annex 1) were published on 26 February 2018 outlining the scope, objectives, deliverables, approach and timescales for this review.<sup>1</sup>
2. The purpose of the review was to improve levels of public confidence in the safety and authenticity of meat processed in the UK and identify potential improvements in the way in which this important sector operates and is regulated.

### Background and Context

3. The UK meat industry is responsible for producing safe food both to the UK market and for export. The meat industry generates £4.4bn<sup>2</sup> of value to the UK economy annually. It is a complex industry encompassing a domestic and international supply chain from farms, abattoirs, cutting plants, cold stores, processing plants through to food distributors, supermarkets, other retailers, and food service producers that provide end products to consumers. Annex 2 attached to this paper provides an overview of the food supply chain, the main actors in the sector and the scope of this review and highlights the particular complexities associated with cutting plants and cold stores activities.
4. Meat continues to be a key component of the UK diet with over 85% of the population consuming it. The size, scale and complexity of meat production means there are a wide range of biological, chemical and physical hazards that have the potential to generate a risk to public health. That is why the production, processing, distribution, retail, packaging and labelling of meat products is governed by such a comprehensive framework of legislation, codes of practice and guidance.
5. Meat Food Business Operators (FBOs) have a duty under law to provide their customers with products which are safe to consume. Their responsibilities include complying with legislation; good environmental and food hygiene practices; prevention of contamination; suitably trained and supervised staff; a food safety

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<sup>1</sup> The review terms of reference were re-focussed in April 2018 following consultation with the Project Board to initially focus on a detailed analysis of meat cutting plants and cold stores. Issues identified in other related parts of the sector have been raised as recommendations for further work.

<sup>2</sup> <https://www.gov.uk/government/publications/food-statistics-pocketbook-2017/food-statistics-in-your-pocket-2017-food-chain>

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system based on Hazard Analysis at Critical Control Points (HACCP) Principles; and the appropriate control of waste products.

6. As the Competent Authorities, the Agencies and Local Authorities (LAs) are responsible for providing assurance to consumers that all food businesses in the sector are meeting their legal obligations to produce safe, authentic food that satisfies hygiene and welfare standards. This review is aligned to the FSA Regulating Our Future (ROF) and FSS Regulatory Strategy programmes which are developing new regulatory models for food safety and standards across the food chain to ensure regulatory oversight remains proportionate, targeted and effective.
7. The focus of this review has been on the 1,713<sup>3</sup> Approved cutting plants and cold stores following the recent high-profile incidents in several food businesses which identified some areas for concern, particularly in relation to industry practices on traceability, durability and authenticity. The scientific evidence underpinning the food safety risk assessment (including clostridium Botulinum) and delivery of Official Controls was explicitly excluded from the scope as this is being addressed through Agencies science and evidence programmes. The starting point of the review is to ensure FBOs meet their responsibilities and have the right approaches in place which will ensure compliance with their legal / regulatory requirements. As well as determining how industry can meet these obligations, the review has also looked at where regulators (FSA/FSS and LAs) should improve enforcement.

### **Review Approach**

8. The review comprised 3 phases:
  - Phase 1 from March to June 2018 focussed on confirming the current state of play in cutting plants and cold stores currently approved to operate, comparison of arrangements in place for the four UK countries (Wales, Scotland, Northern Ireland and England) and emerging areas for improvement;
  - Phase 2 from June to September 2018 identified and assessed options for improvement, developed recommendations, and prepared an outline implementation approach;
  - Phase 3 from October 2018 onwards will complete the detailed design and implementation of the delivery plan.
9. The review was undertaken using a project management approach with a series of interdependent workstreams lead by subject matter experts adopting a consistent approach. This included agreeing the key deliverables, producing a workstream delivery plan and completing regular highlight reports.

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<sup>3</sup> As at June 2018

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10. The review team was subject to formal governance comprising joint SROs reporting to a Project Board chaired by the Agencies' CEOs. This formal governance was complemented by an external Challenge Group, to provide an external perspective advising on review approach and emerging findings. The Group members have brought a broad range of experience across a diverse range of senior public and private sector roles and have had the ability to challenge the activities being carried out whilst also bringing their perspectives and experience.
11. The use of an external Challenge Group has proved a valuable innovation in the way in which the Agencies conducted this type of review activity. The Challenge Group met five times at key points during the review lifecycle and provided important scrutiny on aspects of the review approach and the evaluation methodology.

### **Findings and Recommendations**

#### **Phase 1 Findings**

12. Findings from Phase 1 were gathered through a mix of evidence gathering, desktop review of available documentation, data collection and analysis, stakeholder consultation (both internal and external) interviews and workshops to build up a comprehensive picture of the current arrangements.
13. In summary these findings, which were reported to both Agencies' Boards in Spring 2018, were:
  - **Legislation and Guidance** – Although the legislative framework and accompanying guidance is comprehensive it focuses predominantly on hygiene issues rather than on compliance with requirements relating to durability marking. There is no specific guidance on checks that should be carried out for cold stores following their approval. There are also several different guidance documents published by a number of organisations;
  - **Dual enforcement responsibilities** - There is a complex overlap of roles and responsibilities between the LAs and the Agencies on aspects of traceability, durability and food standards. Stakeholders feedback that they find this dual responsibility confusing and uncoordinated;
  - **Approval** – the application process for approvals of meat establishments is largely paper based. Additionally, there is considerable process variation between the Agencies and LAs and further work is required to develop a more consistent approach both in terms of the application process itself and in FBO performance / compliance assessment. Further work is required to consider standardising the approach between the Agencies and LAs;
  - **The Agencies' Audit and Inspections ("interventions")** – Audits focus on assuring the hygienic production of fresh meat and the use of HACCP-based

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systems which are a requirement. Less emphasis has historically been placed on the determination of minimum durability dates for fresh meat. There is scope for more guidance on the conduct of unannounced inspections and feedback from the Agencies' staff workshops indicates that communications between inspection and audit functions could be improved further by being more consistent or coordinated;

- **People Competence** - Although competency requirements for the Agencies, LA and service delivery partner officials is clearly documented, some of the training could be updated as the focus is largely on slaughterhouses and game handling establishments rather than cutting plants;
- **Third party assurance information** – Competent Authorities do not routinely capture details of the type and number of the specific private standards that individual establishments are assessed against. Industry assurance data relevant to establishments in the scope of this review is not routinely shared between regulators and those that set the private standards;
- The Food Law of Practice in each of the **four countries** provides a broadly consistent framework for LA delivery, although implementation varies according to the specific circumstances in each country;
- **LA and the Agencies' communications** – Communications between the Agencies and LAs are sometimes inconsistent, particularly in relation to transfer of enforcement responsibility for establishments and where there is dual enforcement responsibility or in businesses within a linked supply chain.

### Phase 2 Findings

14. Evidence gathering in Phase 2 focussed primarily on validating issues identified and co-creating potential solutions with stakeholders. As part of our stakeholder engagement and communications activity we have:
  - Written to more than 60 industry stakeholder organisations and organisations representing professional members working in regulation and assurance;
  - Written to all 419 LAs in the four countries during the review to keep them abreast of developments and to circulate the survey;
  - Carried out a two-stage engagement approach with all LAs, including surveying a targeted sample of LAs to gather evidence and initial views and concerns, which in turn informed a secondary survey of all LAs in England, Wales and Northern Ireland. This has been supplemented by a series of face to face engagements with several LAs through national and regional focus groups;
  - Surveyed a selection of FBOs with cold store and/or cutting plant responsibilities to gather feedback on areas such as competency levels of staff, relationships with regulatory authorities, conduct and effectiveness of inspections and



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participation and effectiveness of industry assurance schemes (both retailer and 3<sup>rd</sup> party assurance);

- Facilitated a series of six User Design Workshops attended by almost 100 organisation representatives from food businesses, LAs, trade bodies and other groups. The workshops adopted a user centred design approach – agreeing user profile and journeys, analysing current steps in achieving a goal and highlighting any pain points, followed by identifying potential solutions and actions to implement them;

We have had around 170 responses from stakeholders including 68 organisations represented at workshops and 80 survey responses from LAs and FBOs.

15. The review also considered the lessons learned from previous incidents. The lessons learned themes are consistent with the findings of the review and there is commonality between these and the improvement themes highlighted in the Recommendations section. To some extent this is not unexpected as there is always opportunity to improve based on experience. However, this may also be reflective of industry culture and business practice that the lessons learned do not become sufficiently embedded in parts of the industry to change behaviours.
16. The engagement exercises and the additional research has built on the findings from the initial phase of the review and raised a few additional areas for further consideration – most notably in relation to incidents management, export approvals, the role of agents and brokers trading meat products in cold stores and identified a plethora of descriptors used by the industry to define the durability of meat.

### Options Appraisal

17. The review team developed an appraisal framework for evaluating recommendations. This framework included reductions in the risk to public health as one of the key evaluation criteria. This framework was quality assured by the independent Challenge Group before being used to evaluate recommendations.

### Recommendations

18. The review makes **19** recommendations addressing the improvement themes set out below:
  - *Making the most of all sources of food business information to improve assurance;*
  - *Modernising the delivery of Official Controls;*
  - *Delivering Official Controls more coherently and consistently across both central and local regulatory authorities;*

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- *Providing clearer, concise guidance in co-production with food businesses on their requirements to produce safe food; and*
- *Providing a consistent and uniform people competency model for all those delivering Official Controls.*

### **Making the most of all sources of food business information**

19. The review team identified that industry assurance tends to operate in a similar manner across England, Northern Ireland, Scotland and Wales, with some variation in the assurance schemes available at a country level including those linked to the ability to use regional branding, Protected Geographical Indications (PGI) and Protected Designation of Origin indicators that will have distinct national incentives. Surveys of food businesses in this part of the meat sector indicate a high level of participation in third party assurance schemes and a willingness on the part of the FBOs to share this with the Agencies. The Agencies do not currently hold information at business or establishment level on the details of which private standards (including assurance schemes and supplier requirements) establishments are assessed against. Industry assurance data relevant to establishments in the scope of this review is not routinely shared between regulators and schemes.
20. The work the Agencies have undertaken with 2 Sisters Food Group also demonstrates the value of accessing a range of information to focus more effectively on regulatory assurance activity. This approach could have wider application across the meat sector and recommendations in this area are set out below:
  - *Food Businesses should embrace the greater public and customer confidence that can be generated by demonstrating greater transparency through making management and assurance information available to regulators, (for example, information from DNA testing programmes in relation to authenticity);*
  - *Using the lessons learned from the Agencies' and 2 Sisters Food Group's information sharing initiative, we will work with industry to make more effective use of Food Business management and assurance information to focus regulatory activity more effectively. Retailers and other commercial customers should press for their producers to participate in this information sharing initiative. An industry forum should be established to progress this approach;*
  - *We will continue to explore and test the value in mapping the British Retail Consortium (BRC) Directory open information to the Agencies' data on establishments and of the Agencies' officials making use of information in BRC Global Standards (GS) audit reports as part of official controls at cutting plants. This will inform further work and consideration of how this information could be utilised by the Agencies to better target regulatory assurance activity in this sector;*

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- *Cold Store and Cutting Plant operators should review their current traceability records to ensure comprehensive supply chain information is available for audit on request by the Competent Authority. It is clear that some sectors have gone above legal requirement in this regard, particularly following recent high profile incidents, and, to help secure a more consistent approach it is proposed that industry develop comprehensive traceability proposals from point of slaughter to point of sale for agreement by Competent Authorities; and*
- *Where not already present, FBOs should introduce CCTV at critical points within cutting plants and cold stores even though there is currently no legislative requirement for them to do so. The Agencies will explore the feasibility of legislating for mandatory provision of CCTV in these premises.*

### **Modernising Official Controls**

21. The review identified several opportunities to modernise the delivery of Official Controls to make better use of new technology, and coordinate delivery of Official Controls more effectively to optimise value for money and improve levels of industry compliance. FSS has made a number of improvements to the way in which approvals, unannounced inspection and FBO audit activities are co-ordinated and similar opportunities could also be explored by the FSA particularly in relation to the approvals process in England and Wales. In summary, the recommendations under this theme are to:

- *Integrate the current FSA approvals activity into a single, unified team within FSA Operations Group<sup>4</sup>;*
- *Digitally enable the Agencies' approval processes to facilitate more customer interactions to be completed, submitted and tracked as part of a more on-line case management system: and*
- *Reassess the FSA's Major Incident Plan to align with other elements of the Official Controls framework, in particular in relation to effective coordination and communication with LAs and responsibility for assuring delivery of incident follow-up actions<sup>5</sup>.*

### **Delivering Official Controls more coherently and consistently**

22. In areas where LAs and the Agencies share enforcement responsibility, feedback from stakeholders (both LAs and food businesses) was that effective communication and coordination presented real challenges to the effective consistent delivery of Official Controls and there were examples quoted of conflicting advice being given

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<sup>4</sup> FSS have this in place

<sup>5</sup> FSS reviewed their Major Incident Plan in May 2018

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to food businesses. This was reinforced by recent examples provided to the EFRA inquiry into 2 Sisters Food Group.

23. The outcome of LA risk assessment in accordance with the Food Law Codes of Practice often resulted in cold stores and other meat establishments being categorised as lower risk for hygiene and standards, leading to an inspection period of 2 years or longer or even not being subject to a full inspection. This issue was compounded by insufficient guidance on the conduct of audits and inspections in cold stores and some concerns about the role of agents and brokers and the potential implications for the durability and authenticity of frozen meat.
24. To improve the overall consistency and coherence of delivery of Official Controls within cutting plants and cold stores we recommend:
  - *Further work to assess the role of agents and brokers of meat and the controls applied at this part of the food distribution network;*
  - *Incorporating all FSA inspection and audit activity into a single resource scheduling system, and integrating cutting plant inspection and audit activity (including reporting) to improve coordination and consistency of delivery and provide improved level of assurance;*
  - *Updating the Agencies' Intervention approach to clarify roles and responsibilities and set standards for timely and adequate enforcement action when deficiencies are identified, particularly in relation to the intervention approaches in cutting plants and cold stores and reflect any changes in Food Law Codes of Practices and Manual for Official Controls; and*
  - *Inviting a small, representative number of LAs to participate in a trial to evaluate the use of single organisation to deliver all Official Controls in a geographic location.*

### **Providing Clearer and More Comprehensive Guidance**

25. Good guidance is an important element in supporting and enabling FBO compliance with regulatory requirements and the consistent and effective delivery of Official Controls. Clear, consistent instructions for Authorised Officers not only to provide process information but also to ensure everyone including FBOs fully understand their roles and responsibilities in each of those processes.
26. Although there is a comprehensive framework of guidance available to Authorised Officers delivering Official Controls and FBOs, most of the guidance focuses predominantly on hygiene issues, rather than food safety management systems. There is scope for more guidance to support Authorised Officers and FBOs in FSA/FSS approved establishments in areas such as durability, labelling and traceability. Specific guidance is needed on checks that should be carried out on cold stores following their approval.

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27. Stakeholders were generally supportive of the idea that ownership of the Meat Industry Guide be transferred to the meat sector as it would allow the Central Competent Authority to focus on producing clearer communications on the legislative requirements, whilst leaving the industry to produce good practice to support food businesses. Further work will be needed between the Agencies and industry in this regard to agree effective regulatory input / oversight where required.
28. Recommendations to address this theme are:
- *Industry representative bodies to assume responsibility for the Meat Industry Guide as set out in EU regulations and to further ensure it reflects requirements of the Manual for Official Controls. Further work is required to clarify the regulatory input and oversight;*
  - *Update procedures for Authorised Officers responsible for Approvals, enforcement, inspections and audit of cutting plants and cold stores;*
  - *Update, organise and index guidance and legislation for hygiene and standards inspections using the Agencies' repositories, prioritising any required updates to guidance on durability, labelling and traceability; and*
  - *Work with industry, Westminster Government and the devolved administrations to introduce a more standardised approach to the wording of durability on product labels and require food businesses throughout the meat supply chain to adopt that approach. If necessary, we will propose legislation to mandate this requirement.*

### **Developing a People Competency Model**

29. The effectiveness of businesses food safety management systems and the delivery of Official Controls is predicated on having competent, appropriately trained staff. Although there is some evidence of good practice in the recruitment and training of staff there is scope to improve consistency in industry and the regulators alike and to improve the sharing of learning and development between the Agencies and LAs.
30. Recommendations to address this theme are:
- *All Authorised Officers responsible for delivering Official Controls should be recruited against a common standard across the UK with the appropriate professional skills, experience and qualifications appropriate to their role. There should be on-going development programmes to address emerging issues and regular verification of officer competence. To achieve this it is proposed to develop a standard competency matrix for all job roles with responsibility for delivering Official Controls to underpin recruitment, performance management/internal monitoring, training, contract specifications and development of any future accreditation approach. As a minimum all such staff would be required to have HACCP Level 4 certification;*

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- *FBOs to have at least one person (staff member or contracted support) as a minimum with adequate training in the application of HACCP principles. Good practice already mandates intermediate certificate level in HACCP Practice for meat plants. However, it is clear from recent incidents that this is insufficient, and at least one member of staff should be trained to Level 4 with all other food handlers trained to Level 2 as a minimum. This recommendation could have a significant impact on micro-businesses and further work is required between the Agencies and industry to consider thresholds / proportionality depending on the size of an FBO;*
- *Develop centralised Agency databases to hold FSA/FSS Authorised Officer qualifications and training records, training materials and review and update existing training material to incorporate inspection and audit requirements for Cutting Plants and Cold Stores.*

### **Conclusions**

31. Despite the need for this review triggered by UK meat related incidents, the UK meat industry produces meat considered by many to be amongst the safest in the world. There is a comprehensive framework of legislation and guidance available to food businesses in supporting them in their obligation to produce safe, hygienic, and authentic food which abides by high welfare standards. The industry bodies commitment to work collaboratively with the regulator to improve compliance and overall standards was evident from the levels of stakeholder engagement during the course of this review, particularly in participation in User Design workshops and face-to-face meetings.
32. However, this commitment needs to translate into tangible improvements through the adoption of these recommendations. Consumers need to see visible evidence that food businesses are prioritising food safety as part of their overall management culture which will drive improvements in public confidence in the meat industry.
33. In addition, the review has highlighted areas for improvement by both the Central Competent Authorities (FSS and FSA) and LAs, which should be implemented to add further to the safety of meat produced for human consumption within the UK.

# 1 Introduction

- 1.1 On 1<sup>st</sup> February 2018 the Food Standards Agency (FSA) and Food Standards Scotland (FSS) (the Agencies) announced a UK-wide review of cutting plants and cold stores, in the wake of non-compliance issues identified at various cutting plants during 2017 and early 2018. The terms of reference (Annex 1) were published on 26 February 2018 outlining the scope, objectives, deliverables, approach and timescales for this review.
- 1.2 The review terms of reference were re-focussed in April 2018 following consultation with the Project Board and external Challenge Group to initially focus on a detailed analysis of meat cutting plants and cold stores. Any issues identified in other related parts of the sector are raised as recommendations for further work in this detailed report.
- 1.3 The Agencies are responsible for providing assurance to consumers that all food businesses in the sector are meeting their legal obligations to produce safe, authentic food that satisfies hygiene and welfare standards. The purpose of this review is to improve levels of public confidence in the safety and authenticity of meat processed in the UK and identify potential improvements in the way in which the sector is regulated. There are 3 phases to the review:
  - Phase 1 from March to June 2018 - current state arrangements, comparison of arrangements in place for the four UK countries (Wales, Scotland, Northern Ireland and England) and emerging areas for improvement;
  - Phase 2 from June to September 2018 - identify and assess options for improvement, develop recommendations, and prepare an outline implementation approach;
  - Phase 3 from October onwards - complete the detailed design and implementation of the delivery plan.
- 1.4 An interim report was published on 8 June 2018<sup>6</sup> providing an update on the work to date and setting out the findings from Phase 1 of the review.
- 1.5 This report provides the detailed findings from Phases 1 and 2 and makes recommendations for improvement.

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<sup>6</sup><https://www.food.gov.uk/sites/default/files/media/document/Cutting%20Plants%20and%20Cold%20Stores%20Review%20-%20FSA%2018-06-08.pdf>

### 2 Background and Context

- 2.1 The UK meat industry is responsible for producing safe food both to the UK market and for export. The meat industry generates £4.4bn<sup>7</sup> of value to the UK economy annually. It is a complex industry encompassing a domestic and international supply chain from farms, abattoirs, cutting plants, cold stores, processing plants through to food distributors, supermarkets, other retailers, and food service producers that provide end products to consumers. Annex 2 provides an overview of the food supply chain, the scope of this review and also highlights the particular complexities associated with cutting plants and cold stores activities.
- 2.2 Meat continues to be a key component of the UK diet with over 85% of the population consuming it. The size, scale and complexity of meat production means there are a wide range of biological, chemical and physical hazards that have the potential to generate a risk to public health. That is why the production, processing, distribution, retail, packaging and labelling of meat products is governed by such a comprehensive framework of legislation, codes of practice and guidance.
- 2.3 Meat Food Business Operators (FBOs) have a duty under law to provide their customers with products which are safe to consume. Their responsibilities include complying with legislation; good environmental and food hygiene practices; prevention of contamination; suitably trained and supervised staff; a food safety system based on Hazard Analysis at Critical Control Points (HACCP) Principles; and the appropriate control of waste products.
- 2.4 The Agencies are the Central Competent Authorities in the UK for controls on feed and food (safety and standards) legislation and have enforcement responsibilities in Great Britain (GB) in relation to slaughterhouses, game handling establishments, cutting plants and meat wholesale markets. Regulations (EC) No. 852/2004 and (EC) No. 853/2004 requires that such establishments must be approved by the Agencies to operate
- 2.5 In Northern Ireland (NI) enforcement is carried out by DAERA Public Health Programme on behalf of FSA NI.
- 2.6 The Agencies are also responsible for establishments co-located with those falling into the categories where minced meat, meat preparations, mechanically separated meat, meat products, rendered animal fats and greaves, treated stomachs, bladders and intestines, gelatine and/or collagen are also produced<sup>8</sup>.
- 2.7 All cold stores, except where co-located with Agency Approved establishments, are approved and regulated by Local Authorities (LAs). Meat cutting plants, which operate

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<sup>7</sup><https://www.gov.uk/government/publications/food-statistics-pocketbook-2017/food-statistics-in-your-pocket-2017-food-chain>

<sup>8</sup> In NI, District Councils are responsible for all meat products, rendered animal fats and greaves, treated stomachs and bladders and intestines regardless of co-location.



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on a marginal, local or restricted basis, are exempted from approval by the Agencies and are regulated by LAs however no central list is held for the number of these establishments.

- 2.8 LA functions in relation to animal health and welfare, food standards and feed enforcement are carried out by County Councils and all types of unitary authority depending on the relevant council structure. Feed law enforcement in GB is carried out by LAs (District Councils in England are not responsible for feed law enforcement) and the Port of London Health Authority and in NI by DAERA. Food hygiene enforcement in England is carried out by District Councils and all types of unitary authority and in Wales and Scotland by unitary authorities. These authorities are responsible for the complete range of LA functions. District Councils in NI are responsible for enforcement of food legislation, except that covered by DAERA. In 2018 there were 419 UK LAs with responsibility for food controls (354 in England, 22 in Wales, 32 in Scotland and 11 in NI).
- 2.9 In GB and NI, there are 1,713<sup>9</sup> approved cutting plant and cold store establishments with 977 approved by the Agencies and the remainder by Local Authorities. A third of these establishments are approved as both cutting plants and cold stores. Of these, 45% are cold stores only and 22% are cutting plants only. Figure 1 provides breakdown of all approved establishments approved by LA and the Agencies.

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<sup>9</sup> As at June 2018

**Figure 1 Breakdown of Approved establishments**

	All approved establishments <sup>4</sup>	Both cutting plant and cold store	Cold store only	Cutting plant only	All approved establishments with a cutting plant and/or cold store
<b>Approved by FSA / FSS</b>					
England	905	484	31	302	817
Wales	122	17	4	31	52
NI	51	25	0	25	50
Scotland	96	34	0	24	58
<b>Total</b>	<b>1,174</b>	<b>560</b>	<b>35</b>	<b>382</b>	<b>977</b>
<b>Approved by Local Authorities</b>					
England	3,989	0	559	0	559
Wales	324	0	45	0	45
NI	195	0	72	0	72
Scotland	693	0	60	0	60
Dependencies <sup>5</sup>	37	0	0	0	0
<b>Total</b>	<b>5,238</b>	<b>0</b>	<b>736</b>	<b>0</b>	<b>736</b>
<b>Overall Total</b>	<b>6,412</b>	<b>560</b>	<b>771</b>	<b>382</b>	<b>1,713</b>

2.10 The division of food safety responsibilities between LAs and Central Government has developed over time. The Meat Hygiene Service was set up in 1995 and was responsible for the enforcement of meat hygiene legislation. The Service merged with the Food Standards Agency in 2010. When the FSA was formed the Government agreed that a clear separation was needed between promoting safe food and wider consumer interests on the one hand and promoting the interests of business on the other. The FSA was given direct powers of enforcement action for meat and some aspects of dairy hygiene and to ensure the effectiveness of LAs by co-ordinating, monitoring and auditing LA enforcement activities. Food Standards Scotland became a separate entity from the FSA in April 2015.

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<sup>4</sup> Totals include meat product processing manufacturers approved by LA

<sup>5</sup> Jersey, Guernsey and the Isle of Man

### 3 Scope, Review Methodology and Governance

#### Scope

3.1 On 1 February 2018 the Agencies announced they would be undertaking a UK-wide review of cutting plants and cold stores, in the wake of non-compliance issues identified at various cutting plants. The scientific evidence underpinning the food safety risk assessment and delivery of Official Controls was explicitly excluded from the scope as this is being addressed through Agencies science and evidence programmes.

#### Review methodology

3.2 The review was undertaken by a joint team across the Agencies comprising nine inter-dependent workstreams, each led by subject matter experts. [Figure 2](#) sets out the workstreams and key activities/deliverables.

**Figure 2: Review Workstreams**

Workstream	Key activities and deliverables
Evidence review	<ul style="list-style-type: none"> <li>UK wide evidence review</li> <li>Documenting existing legislative and policy framework, reviewing available industry analysis</li> </ul>
FSA/FSS operating model	<ul style="list-style-type: none"> <li>Assessing As is official controls, approvals process, assurance (inspection and audit) and enforcement processes (including comparative analysis with England, Scotland, Wales and NI models)</li> <li>Distribution of functions, internal communications and IT/databases.</li> </ul>
Operating model analysis – Local Authorities (LA)	<ul style="list-style-type: none"> <li>Assessing As-Is official control, assurance (inspection and audit) and enforcement processes for establishments regulated by Local Authorities</li> <li>Respective roles and responsibilities</li> <li>Relevant legislation, Local Authority official control policy and procedures</li> </ul>
Data modelling & analysis	<ul style="list-style-type: none"> <li>Support workstreams with data needs as required</li> <li>To determine what data is available to provide consumers with confidence</li> </ul>
Industry Assurance	<ul style="list-style-type: none"> <li>Review industry assurance as it relates to the meat industry– including BRC Global Standards, Assured Farm Standards Red Tractor</li> <li>Document the key features of how assurance schemes operate – including initial audit/ assessment, frequency of on-going audit, non-conformance procedures.</li> </ul>
Intervention strategies	<ul style="list-style-type: none"> <li>Document the current intervention approaches for FSA, FSA NI and FSS; and the Local Authorities</li> </ul>
Competency Assessment	<ul style="list-style-type: none"> <li>Document of the As-Is competencies, skills and knowledge requirements for approval, inspection and audit</li> </ul>
Communications, stakeholder engagement & management	<ul style="list-style-type: none"> <li>Identify the key stakeholders and the issues that are important to them. Stakeholder analysis and, based on this analysis, planning of stakeholder engagement activities</li> <li>Development and delivery of a communications plan setting out key messages to each stakeholder group, which media/channels will be used, timescales and how will be evaluated</li> </ul>

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

Workstream	Key activities and deliverables
Project management / Governance & reporting	<ul style="list-style-type: none"> <li>• Ensuring that all the work of workstreams are managed as part of a coherent project. Covers review planning, monitoring/reporting and governance, managing key risks and issues</li> <li>• Creating the infrastructure necessary for managing the work and tracking outcome / benefit delivery</li> </ul>

3.3 A project management approach was used to manage and deliver the review and all workstreams have adopted a consistent approach, agreeing the key deliverables, producing a workstream delivery plan, completing regular highlight reports, managing risks and issues and being flexible to changes in requirement as findings emerge. Workstreams have undertaken a mix of evidence gathering, desktop review of available documentation, data collection and analysis, stakeholder consultation (both internal and external), interviews and workshops. The approach includes agile tools and techniques where appropriate, for example 'show and tell' reviews to share emerging findings and identify interdependencies.

3.4 Evidence gathering in Phase 2 focussed primarily on validating issues identified and co-creating potential solutions with stakeholders. A full list of all stakeholders engaged with is included in Annex 3. As part of our stakeholder engagement and communications activity we have:

- Written to more than 60 industry stakeholder organisations and organisations representing professional members working in regulation and assurance;
- Written to all 419 LAs in the four countries during the review to keep them abreast of developments and to circulate the survey;
- Carried out a two-stage engagement approach with all LAs, including surveying a targeted sample of LAs to gather evidence and initial views and concerns, which in turn informed a secondary survey of all LAs in England, Wales and Northern Ireland. This has been supplemented by a series of face to face engagements with several LAs through national and regional focus groups;
- Surveyed a selection of FBOs with cold store and/or cutting plant responsibilities to gather feedback on areas such as competency levels of staff, relationships with regulatory authorities, conduct and effectiveness of inspections and participation and effectiveness of industry assurance schemes (both retailer and 3<sup>rd</sup> party assurance);
- Facilitated a series of six User Design Workshops attended by almost 100 organisation representatives from food businesses, LAs, trade bodies and other groups. The workshops adopted a user centred design approach – agreeing user profile and journeys, analysing current steps in achieving a goal and highlighting any pain points, followed by identifying potential solutions and actions to implement them;

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

- Carried out a detailed analysis of the lessons learned exercises conducted on previous food incidents occurring since June 2013. This has been supplemented by interviews with a number of food businesses involved in previous incidents;
- Carried out unannounced reality checks in Scotland in selected approved cutting premises to compare outcomes with last conducted audit and re-affirm understanding of the current position; and
- Carried out a desktop exercise in Scotland to compare non-compliances identified at scheduled audits with those identified from unannounced inspections.

3.5 We have had around 170 responses from stakeholders including 68 organisations represented at workshops and 80 survey responses from LAs and FBOs.

### Governance

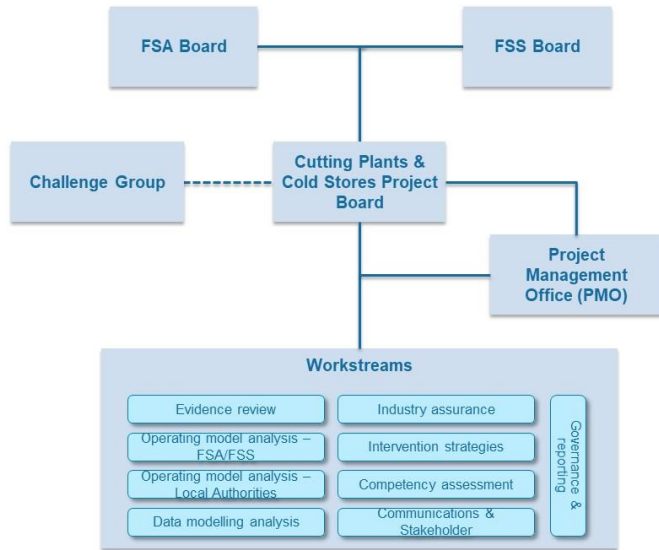
3.6 The review team was subject to formal governance comprising joint Senior Responsible Owners (SROs) reporting to a Project Board chaired by the Agencies' CEOs. This formal governance was complemented by an external Challenge Group, to provide an external perspective advising on review approach and emerging findings. The group members have brought a broad range of experience across a diverse range of senior public and private sector roles and have had the ability to challenge the activities being carried out whilst also bringing their perspectives and experience.

3.7 The use of an external Challenge Group has proved a valuable innovation in the way in which the FSA and FSS conducted this type of review activity. The Group met five times at key points during the review lifecycle and provided important challenge on aspects of review approach and evaluation methodology.

3.8 Figure 3 sets out the review governance and reporting arrangements.

### **Figure 3: Review Governance and Reporting Arrangements**

# REVIEW OF MEAT CUTTING PLANTS AND COLD STORES



Meetings	Frequency
Cutting Plants & Cold Stores Project Board	Monthly
Challenge Group	Every 6 weeks
SRO checkpoint (including FSA NI Head of Ops Delivery)	Fortnightly-Thursdays
Workstream checkpoint	Weekly - Fridays
PMO review	Weekly - Mondays

## 4 Review findings

### Phase 1

#### Legislation and Guidance

- 4.1 Food Law in the UK has developed over time, with the Food Safety Act 1990 enshrining many basic concepts in relation to food safety and standards that were then used to inform the development of subsequent EU law. Domestic regulations made under that Act or under the European Communities Act 1972 give effect to requirements of EU food law either by implementing Directives or providing enforcement mechanisms for directly applicable EU Regulations. In addition, domestic implementing regulations provide enforcement powers to competent authorities. The vast majority of food safety and standards obligations placed upon businesses in the meat sector are derived from directly applicable EU law.
- 4.2 Regulation (EC) 852/2004 and Regulation (EC) 853/2004 both establish the principle that primary responsibility for food safety rests with the food business operator. Regulation (EC) 178/2002 prohibits food businesses from placing unsafe food on the market. It is therefore the responsibility of each business operator to ensure that food safety is not compromised by establishing food safety management systems based on the HACCP principles, together with the application of Good Hygiene Practices (GHP).
- 4.3 Food businesses that produce prepacked foods intended for supply to the final consumer or mass caterers must apply an accurate date of minimum durability, under Regulation (EC) 1169/2011. Food businesses that supply food not intended for the final consumer or mass caterers to other food businesses are responsible for providing those other food businesses with sufficient information to enable them to meet their responsibilities, where appropriate, for applying a date of minimum durability.
- 4.4 The following categories of meat establishment are subject to Regulations (EC) No. 852/2004 and (EC) No. 853/2004 and must be **approved** by the Agencies to operate:
- Slaughterhouses;
  - on-farm slaughter facilities;
  - game handling establishments;
  - cutting plants;
  - meat wholesale markets.
- 4.5 Annex 4 details the regulations applicable to cutting plants and cold stores.

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

- 4.6 In GB these establishments are subject to official controls enforced by the Agencies. In NI enforcement is carried out by the DAERA Public Health Programme on behalf of the FSA.
- 4.7 The Agencies are also responsible for establishments co-located with those falling into the categories listed above in which minced meat, meat preparations, mechanically separated meat, meat products, rendered animal fats and greaves, treated stomachs, bladders and intestines, gelatine and/or collagen are also produced<sup>10</sup> or where cold storage is undertaken.
- 4.8 A cutting plant is clearly defined in legislation. There is no equivalent legal definition of a cold store or re-wrapping establishment but guidance on approval of establishments issued by the Agencies in 2016 does provide a definition for these types of establishments. A review of cold stores was undertaken in 2014 to clarify the confusion among some LAs as to which cold stores require approval, and FSA subsequently issued guidance in July 2016 following this review.
- 4.9 Certain categories of meat processing establishments are exempt from approval, including retail establishments, poultry slaughter and cutting on farm and those processing small volumes of product of animal origin. These establishments are required to register with their relevant Competent Authority – the LA Environmental Health Department or Trading Standards.

### **Official Controls Guidance**

- 4.10 The Guidance on the approval process is set out in the Operational Policy for the Approval of Food Establishments undertaken by the FSA in England, Wales and Northern Ireland and in standalone guidance in Scotland. This focuses on compliance with all relevant areas of food law as required by Article 3 of Regulation 854/2004 on official controls.
- 4.11 There is a comprehensive framework of guidance in place for LAs relating to food businesses, which is summarised in Figure 4 below. The guidance focus predominantly on hygiene issues.

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<sup>10</sup> In NI, District Councils are responsible for all meat products, rendered animal fats and greaves, treated stomachs and bladders and intestines regardless of co-location.



## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

**Figure 4: Guidance Framework**

Area	Guidance
<b>General Guidance</b>	
The Food Law Code of Practice and associated Practice Guidance	Food Law Code of Practice and associated Practice Guidance (England) also available Wales, Scotland, Northern Ireland
Approved Food Establishments - list of guidance documents	Approved Food Establishments, Approved Establishments Scottish National Protocol
The Guide on animal by products and edible co-products	Animal by-products and edible co-products guidance
Food labelling and safety	Food labelling summary
Food date labelling and storage advice	Food date labelling and storage
Food and Drink Federation's Industry Guidance on Setting Product Shelf Life	Industry Guidance on Setting Product Shelf Life
HACCP in meat plants	HACCP
Guidance on <i>L. monocytogenes</i> controls and shelf life at establishments that are producing RTE products published by the British Retail Consortium (BRC) and the Chilled Food Association (CFA)	Listeria monocytogenes controls
<b>FSA Approved Cutting Plants &amp; co-located activities</b>	
Cutting Plant – general	Operational Policy for the Approval of Meat Establishments Undertaken by the FSA, Approved Establishments Scottish National Protocol, Meat Industry Guide (MIG), MIG – Cutting of meat, MOC Manual for Official Controls, How the meat plant audit process works, The supply of wild game: a guide to food hygiene legislation
Cold Store*	Guide to storage and handling of frozen food
Meat Preparations*	MIG – Meat Processing including Meat Preparations
Meat Processing Plant*	MIG - Meat Processing
Mechanically Separated Meat*	Summary of the legal requirements to produce Mechanically Separated Meat (MSM); November 2012, MIG - Meat processing including MSM Desinewed meat (DSM), DSM from Ruminant Bones in the UK, DSM from non-ruminant bones or poultry carcasses in the UK, MIG - Meat Processing
Minced meat*	MIG Meat Processing including Minced Meat, Guidance for official controllers and enforcement officers in FSA & LAs on the approach to be taken on the enforcement of the legislative requirements regarding the number of days between the slaughter and mincing of chilled meat.
Wrapping & Packaging	Wrapping Packaging and Transport Hygiene, The Guide to vac packing
Labelling	Labelling of minced meat, meat preparations and MSM
<b>LA Approved Establishments</b>	
General	Approval of establishments, Local Authority Frequently Asked Questions

4.12 EU regulations require Member States to encourage the development of national guides to good practice for hygiene and for the application of HACCP principles. When national guides to good practice are developed, they shall be developed and disseminated by food business sectors in consultation with representatives of parties whose interests may be substantially affected, such as competent authorities and consumer groups; and having regard to relevant codes of practice of the Codex Alimentarius.

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

- 4.13 The Manual for Official Controls (MOC) provides details of the tasks, responsibilities and duties FSA staff (and its representatives) undertaken in approved meat establishments. The MOC is amended when there are changes in legislation, policy, operational procedure and administrative updates. Specialist veterinary portfolios are responsible for identifying and drafting required changes and an editorial team publish these changes.
- 4.14 The Meat Industry Guide (MIG) is aimed at the meat industry – both new and established businesses involved in the slaughter, cutting and processing of fresh meat. The MIG provides non-binding advice and guidance on the legal requirements of the EU Food Hygiene Regulations that apply to FBOs in the meat sector and provides a widely agreed view of good practice on how to meet these requirements. The MIG is amended when there are changes in legislation and policy and in line with any major MOC changes. FSA policy along with specialist veterinary portfolios are the main source of changes for the MIG and an editorial team publish the changes.

### **Official Controls – Operational Delivery**

#### **FSA/FSS Approval**

- 4.15 The FSA operational policy is published on Food Gov<sup>9</sup> and details the approval process for slaughterhouses, cutting plants, game handling establishments and wholesale meat markets in England, Wales and Northern Ireland. A similar protocol is available for Scotland.<sup>10</sup>
- 4.16 There is also a guidance document available for LA Approval Officers detailing the procedures they are to follow in providing approval to other establishments processing or cold storing product from animal origin. The FSA is currently in the process of implementing changes to the operational policy. The industry consultation for these changes closed on 20 September 2018.
- 4.17 The high-level approval procedures applying to food businesses is summarised in Figure 5. The Agencies receive around 200 applications for approval each year. Applications are usually made by post using application forms available from Food Gov or by email. Applicants can submit an application using a portal on Gov UK but very few choose this method. Guidance information on the process is also available online.<sup>11</sup>

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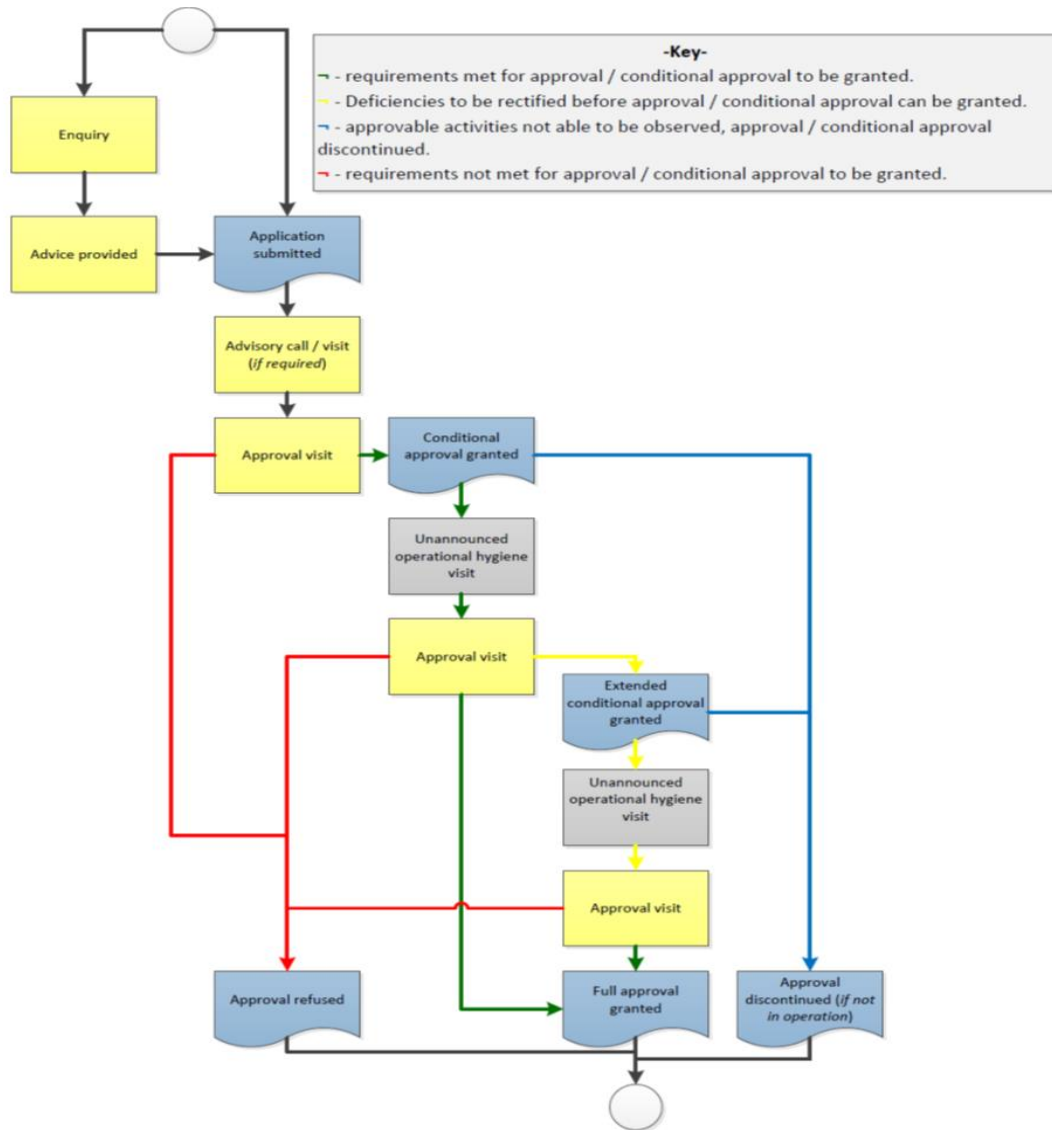
<sup>9</sup> <https://www.food.gov.uk/sites/default/files/media/document/oppolicy-meatestablishments.pdf>

<sup>10</sup> [https://www.foodstandards.gov.scot/downloads/Approved\\_Establishments\\_Working\\_Group\\_-\\_Scottish\\_National\\_Protocol-February\\_2017.pdf](https://www.foodstandards.gov.scot/downloads/Approved_Establishments_Working_Group_-_Scottish_National_Protocol-February_2017.pdf)

<sup>11</sup> <https://www.food.gov.uk/business-guidance/applying-for-approval-of-a-meat-establishment>

# REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

**Figure 5: Approval procedures**



- 4.18 The policy/protocol/LA Guidance documents explain the division of responsibilities in relation to which competent authority is responsible for each of the establishments.
- 4.19 LAs are responsible for delivering official controls for other products of animal origin (non-meat) This leads to some establishments with “dual enforcement” responsibilities split between the LA and the Agencies for different activities within the business, which are not always subject to a clear physical separation. This complex overlap of roles and responsibilities between the LAs and the Agencies on aspects of traceability, use by dates and food standards is summarised in [Figure 6](#). Stakeholders provided feedback that they find this dual responsibility confusing and uncoordinated.

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

**Figure 6: Roles and responsibilities between the LAs and the Agencies on aspects of traceability, use by dates and food standards**

Legislation	FSA/FSS enforced	LA enforced
Durability marking requirements – Use By Date and Best Before Date marking (labelling)		X
Date marking of frozen meat with kill / slaughter / processing date in slaughterhouses, cutting and game handling plants and in approved co-located establishments further processing meat	X	
Date marking of frozen meat with processing date in approved standalone establishments further processing meat		X
Food Safety Requirements – (food must not be unsafe) in slaughter, cutting and game handling plants and in approved co-located establishments further processing meat	X	
Food Safety Requirements – (food must not be unsafe) in approved standalone establishments further processing meat		X
Traceability requirements generally	X	X
Traceability requirements for ID marked meat	X	
Product withdrawal and recall requirements in slaughter, cutting and game handling plants and in approved <u>co-located establishments</u> further processing meat	X	
Product withdrawal and recall requirements in approved standalone establishments further processing meat		X
HACCP based requirements in slaughter, cutting and game handling plants and in approved <u>co-located establishments</u> further processing meat	X	
HACCP based requirements in approved <u>standalone</u> establishments further processing meat		X
Microbiological criteria requirements in slaughter, cutting and game handling plants and in approved co-located establishments further processing meat	X	
Microbiological criteria requirements in approved standalone establishments further processing meat		X
Animal By-product requirements in “food hygiene establishments” – slaughter, cutting and game handling establishments and approved co-located establishments further processing meat <sup>6</sup>	X	
Animal By-product staining requirements in approved slaughter, cutting and game handling establishments and approved co-located establishments further processing meat <sup>7</sup>	X	
Animal By-product requirements in approved standalone establishments further processing meat, in other approved premises handling other products of animal origin, in registered food premises and pet food processing plants <sup>8</sup>		X

4.20 FSS have recently implemented a step into the approval process whereby the documented Food Safety Management System is subject to a sense check by a member of the Approvals Team who has knowledge of HACCP. This is intended to save resource and reduce assessment visits being undertaken until such time that the applicant has demonstrated their readiness.

<sup>6</sup> DAERA in NI

<sup>7</sup> DAERA in NI

<sup>8</sup> DAERA in NI

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### **FSA/FSS Post approval – inspection and audit (“interventions”)**

- 4.21 Audit of the Food Business Operators establishments following approval is the responsibility of the Agencies as required by Regulation (EC) 854/2004. Audits focus on the hygienic production of fresh meat and their implemented Food Safety Management Systems (FSMS). The current format of the audit report and auditor guidance place less emphasis on the determination of minimum durability dates for fresh meat.
- 4.22 Audits (full and partial) are undertaken on a risk-based frequency, with food businesses demonstrating compliance being audited less frequently. The full audit assesses all cutting plant approved activities and FSMS. There is a legal requirement for full audits to be announced. If at least one major non-compliance is found at a full audit a follow-up partial audit will be scheduled to review the actions taken to address non-compliances and this process is repeated until compliance is achieved. The audit comprises a systematic review looking at compliance since the previous audit.
- 4.23 At standalone cutting plants, during the intervals between audits at least one unannounced inspection is undertaken by an Authorised Officer. There is limited guidance on the conduct of unannounced inspections, but their primary focus is on inspection of the daily operation of the plant rather than a systematic review of its food safety management systems. At co-located cutting plants, supervision of the activities takes place by the local team, but guidance on the number of visits and their focus is limited.
- 4.24 Across the UK there are different delivery models involving a mix of FSS/FSA employed staff and service delivery partners. In some circumstances it has been reported that the coordination of these delivery models leads to unnecessary footfall in some businesses. Also it does not facilitate the building of experience in Authorised Officers who may only see an FBO once a year. It is not unusual to find up to 5 different interventions being conducted by 5 different individuals in some of the models.
- 4.25 The definition of audit outcomes and subsequent inspection frequencies are summarised in [Figure 7](#) below:

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

**Figure 7: Intervention summary**

Audit Outcome	Definition	Full audit frequency		Partial audit frequency	UAI frequency (standalone cutting plants only)
		Stand-alone cutting plants	Slaughterhouses Game Handling Co-located CPs		
<b>Good</b>	No major or critical non-compliances during audit period	12 months	12/18 months	0	1
<b>Generally Satisfactory</b>	No critical non-compliances No more than 2 major non-compliances	12 months		Within 3 months	1
<b>Improvement Necessary</b>	No critical non-compliances or 3-6 major non-compliances	3 months		Within 1 month	1
<b>Urgent Improvement Necessary</b>	1 critical or >6 major non-compliances	2 months		Within 1 month	1
Plants qualifying for extended audit frequency (except Scotland)					
<b>Good/Good</b>	No major or critical non-compliances during both audit periods	24 months	36 months	0	2

4.26 Analysis of full audit outcomes for England and Wales, highlights that audit durations are longer in the least compliant food businesses. [Figure 8](#) shows numbers of full audits carried out between 2015 and 2018 with Improvement Necessary or Urgent Improvement Necessary outcomes and the percentage of audits they represent. Auditor hours on Urgent Improvement Necessary is currently around 50% higher than audit duration for audits in more compliant outcome categories.

**Figure 8: Improvement Necessary and Urgent Improvement Necessary Audits**

	Full audits	IN & UIN outcome	% of IN & UIN audits
2015	804	73	9%
2016	524	68	13%
2017	503	95	19%
2018	197	30	15%

4.27 Feedback from staff also suggests some regional variation in the application of enforcement action with auditors carrying out action in some regions whilst in others the information will be passed to field operations staff for action.

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Local Authority Delivery

- 4.28 In relation to the businesses within the scope of this review LAs have responsibility for delivery of food hygiene and food standards official controls in establishments assessed as exempt from the Agencies approval on the basis that they are retail establishments operating on a 'marginal, localised and restricted basis' as set out in Article 1 of EC Regulation 853/2004. LAs also have responsibility for food standards official controls in the Agencies' approved cutting plants. Figure 6 provides a more detailed breakdown of the split of responsibilities in cutting plants with regards to traceability and food standards. LAs are responsible for delivery of controls in cold stores except where they are co-located with a business approved by the Agencies.
- 4.29 To facilitate a consistent LA regulatory approach, the FSA has published a statutory Code of Practice and associated Practice Guidance and developed a range of aide-memoires. Similar approaches apply in Wales, NI and Scotland. The FSA/FSS/LA Framework Agreement also requires all LAs to develop an annual (food enforcement) Service Plan and a number of policies and procedures demonstrating how official controls will be delivered.
- 4.30 The Code of Practice provides a consistent definition of "interventions", and delivery of these interventions is reported to the FSA/FSS through annual monitoring returns. Figure 9 shows food hygiene interventions carried out in 2017/18 in the four countries.

**Figure 9: Food hygiene interventions carried out in 2017/18 in the four countries.**

Country	Inspections and audits	Verification and surveillance	Sampling visits	Advice and education	Revisits and other visits	Information/intelligence gathering	Value not recognised	Totals
England	213,668	43,528	8,024	12,903	N/A*	28,296	N/A*	<b>306,419</b>
Northern Ireland	8,553	3,098	2,542	1,130	N/A*	714	N/A*	<b>16,037</b>
Wales	18,252	4,927	1,599	653	N/A*	2,461	N/A*	<b>27,892</b>
Scotland	22,173	N/A*	1,480	1,682	10,276	1,086	341	<b>37,038</b>
<b>Totals</b>	<b>262,646</b>	<b>51,553</b>	<b>13,645</b>	<b>16,368</b>	<b>10,276</b>	<b>32,557</b>	<b>341</b>	<b>387,386</b>
<b>Intervention types as a % of total food hygiene interventions</b>								
England	69.7%	14.2%	2.6%	4.2%	0%	9.2%	0%	<b>100%</b>
Northern Ireland	53.3%	19.3%	15.9%	7.0%	0%	4.5%	0%	<b>100%</b>
Wales	65.4%	17.7%	5.7%	2.3%	0%	8.8%	0%	<b>100%</b>
Scotland	59.9%	0%	4.0%	4.5%	27.7%	2.9%	0.9%	<b>100%</b>

\* Scotland figures for Revisits and other visits are equivalent to those for Verification and surveillance in the rest of the UK. Please note, the Scotland figures are provisional



## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Food standards interventions carried out in 2017/18

Country	Inspections and audits	Verification and surveillance	Sampling visits	Advice and education	Revisits and other visits	Information/intelligence gathering	Value not recognised	Totals
England	61,281	7,343	2,564	3,346	N/A*	5,811	N/A*	<b>80,345</b>
Northern Ireland	5,255	2,066	1,050	716	N/A*	720	N/A*	<b>9,807</b>
Wales	10,284	1,120	537	230	N/A*	259	N/A*	<b>12,430</b>
Scotland	13,759	N/A*	2,359	576	1,908	518	198	<b>19,318</b>
<b>Totals</b>	<b>90,579</b>	<b>10,529</b>	<b>6,510</b>	<b>4,868</b>	<b>1,908</b>	<b>7,308</b>	<b>198</b>	<b>121,900</b>
<b>Intervention types as a % of total food standards interventions</b>								
England	76.3%	9.1%	3.2%	4.2%	0%	7.2%	0%	<b>100%</b>
Northern Ireland	53.6%	21.1%	10.7%	7.3%	0%	7.3%	0%	<b>100%</b>
Wales	82.7%	9.0%	4.3%	1.9%	0%	2.1%	0%	<b>100%</b>
Scotland	71.2%	0%	12.2%	3.0%	9.9%	2.7%	1.0%	<b>100%</b>

\* Scotland figures for Revisits and other visits are equivalent to those for Verification and surveillance in the rest of the UK. Please note, the Scotland figures are provisional.

4.31 There are issues in terms of the frequency at which cold stores would require inspection based on the assessment of risk in line with the Food Law Codes of Practice. This assessment often resulted in cold stores being assessed as lower risk for hygiene and standards leading to an inspection period of 2 years or longer, with inspections being planned on the basis of intelligence. Some LAs suggested that the Food Law Code of Practice should be updated to require a greater frequency of inspection of these businesses. Given the role in many of the recent incidents a review of this risk assessment and subsequent inspection frequency may be beneficial.

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*'A more appropriate and relevant scoring system for these usually low risk premises is important to reduce/prevent food fraud and its implications for the food industry and safeguarding public health.'*

*Quote from Phase 2 LA Survey*

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4.32 Other suggestions for improvement included standardised procedures, checklists and reports for both cutting plants and cold stores, joint training, consistent guidance, mandation of the Food Hygiene Rating Scheme in areas where it operates and extending it to cutting plants and cold stores, or the potential for development of a single enforcement body responsible for approval, inspection and audit of cutting plants and cold stores in a geographical area.

### **Summary of comparative country analysis**

4.33 Annex 5 provides an overview of the comparative country analysis in terms of legislation, approval, audit and inspection regime, staff skills and experience and industry assurance.

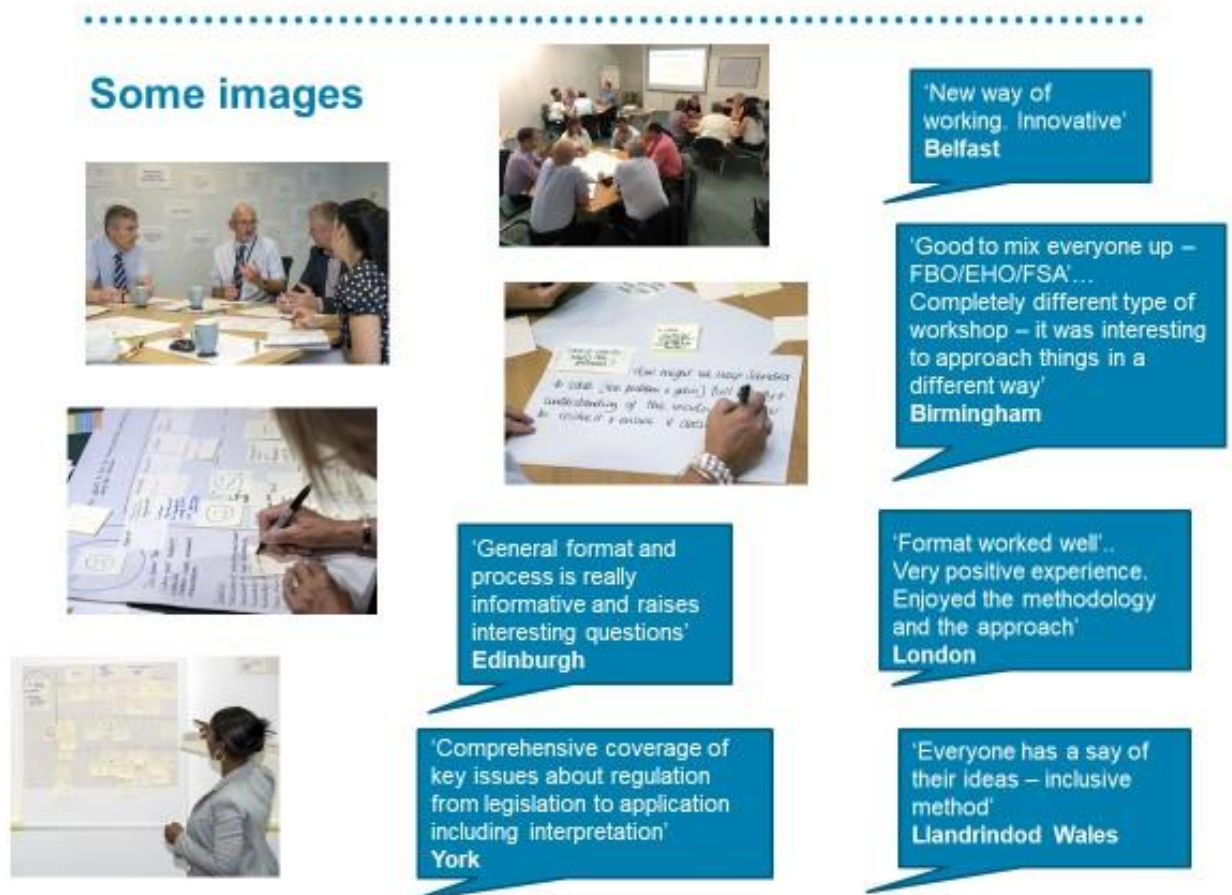
4.34 In summary the key findings are:

- The Food Law Code of Practice in each of the countries provides a broadly consistent framework for LA delivery of food law official controls. There are, however, some differences in approach to implementation, which are influenced by the specific circumstances in each country. Most notably, all LAs in Scotland, Wales and Northern Ireland are unitary authorities (delivering both food hygiene and food standards controls) whereas in England LAs will be a mix of unitary and two tier (where controls for hygiene and standards are delivered by different LAs);
- Approval, inspection and audit of approved meat establishments is carried out in accordance with a consistent legislative framework but with some process and delivery responsibility variations tailored to the circumstances of each country; and
- Industry assurance tends to operate in a similar manner across England, Northern Ireland, Scotland and Wales. There is some minor variation in the assurance schemes available at a country level including schemes linked to the ability to use regional branding, Protected Geographical Indications (PGI) and Protected Designation of Origin (PDO).

## Phase 2

### User Design Workshops

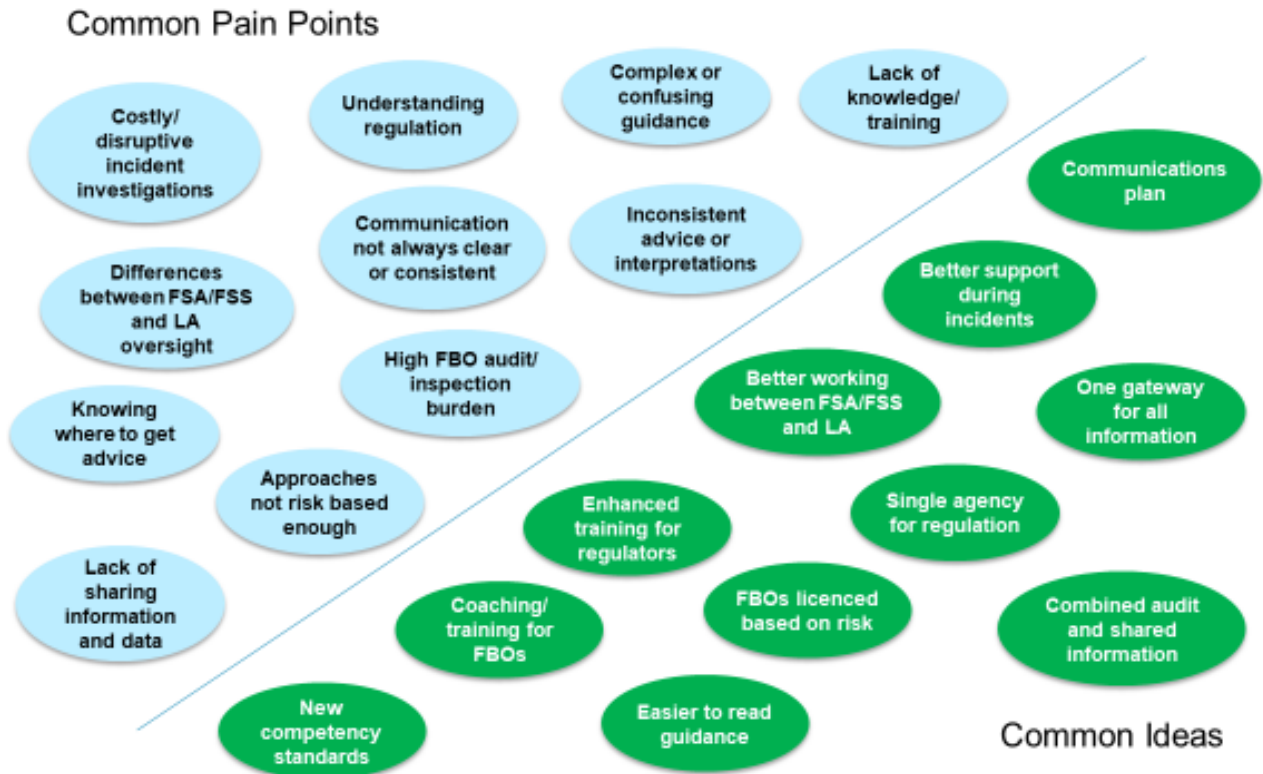
- 4.35 Six one-day workshops in England, Wales, Northern Ireland and Scotland were held with stakeholders across the UK during August 2018. Almost 100 organisation representatives attended from food businesses, Local Authorities, trade bodies and other interest groups.
- 4.36 The workshops focussed on understanding the different perspective of stakeholders in the meat industry, jointly developed recommendations for change and identified any potential implementation issues at an early stage.
- 4.37 The workshops adopted a user centred design approach – agreeing user profile and journeys, before analysing current steps in achieving a particular goal and highlighting any pain points.



- 4.38 Figure 10 identifies some of the common pain points and ideas identified by attendees across the User Design Workshops.

Figure 10:

## User Design Workshops – Common Pain Points and Ideas



4.39 The workshops identified a number of common pain points/issues in the current approach including:

- Guidance being considered too complex and ambiguous resulting in confusion for FBOs between what is legislation, guidance and advice;
- Some inconsistency in advice and the interpretation of legislation by different professionals;
- Differences in approach between FSA/FSS and LAs and dealing with both for food hygiene and food standards;
- Approach not considered to be related to relative risk;
- The high level of disruption, cost and audit burden for FBOs and during incidents;
- A perceived lack of consistency and open communication between regulators and FBOs.

4.40 In response, attendees identified a number of solutions/ideas:

- Collaboration with industry to develop simplified, business friendly guidance which is available in various forms and easily accessible;
- Consistent interpretations of guidance and advice;
- New competency standards for inspectors and auditors with enhanced ongoing training available to a variety of stakeholders;

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- All regulation and enforcement to be the responsibility of one agency regardless of the size of the FBO for each premise;
- Combined audit and shared audit information between regulators;
- Agree a communication plan particularly when incidents occur;
- FBOs licenced based on risk.

4.41 Annex 6 provides a link to the published report of the findings from the user design workshops.

### **Food Business Survey**

4.42 325 Food Businesses were surveyed across the UK during July and August 2018 to seek views on how meat cutting plants and cold stores interact with the Agencies, DEARA and LAs, and the value they get from these interactions. The survey was in two parts, a survey for Cutting Plants and a survey for Cold Stores. Each had quantitative and qualitative questions with opportunities to use free text for comments. In total 58 separate responses were received. The FSA Social Science Team have reviewed the survey responses and have confirmed that despite the low response rates, which may not necessarily mean the results are representative some of the free text comments provide useful insight. Annex 7 summarises FBO and LA survey findings.

4.43 Of these responses:

- Respondents reported providing staff with good levels of training in food safety and standards, HACCP, GMP and Health & Safety;
- Over 85% stated they felt the levels of contact with regulators (LA and the Agencies) was about right and many welcomed the role of veterinary auditors who were viewed as providing a valuable assurance to FBOs;
- FSA/FSS/DAERA contact with cutting plants is more regular and consistent than LAs contact with cutting plants;
- Over 70% reported being members of a third party assurance scheme and most confirmed they would be willing to share information from third party assurance with the regulator;
- 14% found the FSA guidance not very easy to use although all LAs found the guidance produced for them was useful. However, there was limited understanding of respective roles and responsibilities between LAs and the FSA and some respondents reported inconsistent application of standards by unannounced inspectors as a particular issue;
- Over 60% had a clear understanding of roles and responsibilities, however, some responded reported the need for clarity of advice and consistency between inspectors.

### **One to One Discussions**

4.44 During August, we carried out one to one discussions with target food businesses across the UK. The purpose of these discussions was to obtain detailed insight from the industry first-hand on emerging issues from the review and cover any other

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business concerns. This was presented as an anonymous opportunity to optimise participation and engagement.

4.45 FSS representatives met six food businesses across the country. The discussions identified:

- Guidance and information to FBOs
  - Difficult to source guidance and information online. Guidance which can be readily sourced online or via the regulator unclear and confusing;
  - Regulator guidance not always forthcoming and a sense that enforcement is the default position;
  - HACCP plans not updated. Some not updated for several years and FBO unaware that process changes require re-validation of durability dates etc;
  - Smaller FBO businesses rely heavily on external contractors for Technical guidance and instruction. Limited in-house knowledge and understanding of legislative requirements.
- Delivery of Official Controls
  - Several FBOs felt there has only been recent focus on durability dates with limited or no previous interventions by the regulator;
  - Several FBOs felt they have been given insufficient time to correct issues around durability dates by the regulator and that interventions were disproportionate in some cases.

4.46 Representatives from the FSA also met with 6 organisations from across the UK. The discussions identified the following:

- Initial views they held
  - The need for the review was recognised and understood;
  - Dual enforcement responsibility and duplication was seen to be an issue;
  - Cold stores were seen to pose less problems, especially public ones used by various other industries.
- Responsibilities
  - It was recognised that FBOs and not regulators are responsible for producing safe food and following legislation;
  - A number agreed that a better understanding by all FBOs of their responsibilities was needed but that better clarification of them was also required;
  - A need for greater accountability and understanding of the consequences across the supply chain was recognised.
- Third party assurance
  - Third party audits were seen by some as a higher bar than the regulatory audits while others did not feel they were robust enough or trusted the data;
  - Some called for higher standards to be set than just the minimum set out in legislation;
  - Sharing of third party data was seen by some as beneficial but was not seen as a silver bullet.
- Guidance
  - Some noted that it was role of FBOs to understand and follow the guidance;

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- Generally it was seen that the guidance could be clarified and that requirements and best practice should be separated;
- There was willingness in some to help develop guidance with the industry.
  
- Training and competency
  - It was generally agreed that staff needed to be fully aware of the regulations they were applying.
  
- Other issues
  - Increased DNA testing was suggested as a way to improve assurance;
  - It was suggested that there needs to be more ways to report concerns with a food businesses.

### **LA Engagement**

- 4.47 Phase 2 included a focussed programme of engagement with LAs. This recognised the very important role that LAs play as a key delivery partner for the Agencies in relation to food and feed law official controls and the unique perspective they bring to discussions on controls in cutting plants and cold stores.
- 4.48 The LA engagement approach sought to:
- Assess the 'As is' landscape for official control delivery by LAs, including:
    - Respective roles and responsibilities;
    - Relevant legislation, LA official control policy and procedures and available guidance;
    - Approach to risk assessment and enforcement;
    - Communication and coordination of delivery.
  - Consider the current challenges in official control delivery and potential areas for change to improve the safeguards in place.
- 4.49 Engagement with LAs has taken various forms, including general update letters to keep LAs informed of the process, targeted surveys and face to face discussion.
- 4.50 Phase 1 engagement (prior to the June Board Paper) revolved around an initial canvassing of views from a targeted number of LAs in England (29 based on involvement in recent incidents) and all LAs in the devolved countries. This resulted in a very good level of feedback on some of the key issues being faced, particularly in relation to concerns around communication and coordination between the different enforcement bodies and clarity on roles and responsibilities.
- 4.51 This in turn informed the Phase 2 engagement where a survey was sent to all LAs to sense-check the initial feedback to confirm whether it gave a representative summary. The second stage survey was also used as an opportunity to ask a number of questions to get views on potential areas where there might be scope for improvement and/or an alternative approach, again informed by the Phase 1 responses. A summary of the responses received is attached at Annex 7.

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### **Incidents – Lessons Learned**

4.52 The review also considered lessons learned from previous incidents. These lessons learned themes are consistent with the findings of the review and there is a commonality between these and the themes referenced above. To some extent this is not unexpected as there is always opportunity to improve based on experience. But it is also reflective of industry culture and business practice that the lessons learned do not become sufficiently embedded to change behaviours. A summary of the lessons learned analysis is contained in Annex 8.

## **Options Appraisal and Recommendations**

### **Options Appraisal**

4.53 The engagement exercises and the additional research has built on the findings from the initial phase of the review and raised a few additional areas for further consideration – most notably in relation to incidents management, export approvals, the role of agents and brokers trading meat products in cold stores and identified a plethora of descriptors used by the industry to define the durability of meat.

4.54 The review team developed an appraisal framework for evaluating recommendations. This framework was quality assured by the independent Challenge Group before being used to evaluate recommendations. More information on the options appraisal framework is included in Annex 9.

4.55 Evaluation was undertaken in two stages which consisted of an initial internal assessment by the review team followed by an assessment by a panel of senior leaders from across the Agencies (including both SROs).

4.56 The evaluation criteria fell into three main categories of desirability, feasibility and achievability, as follows:

#### Desirability

- Assurance
- Food Safety Risk
- Sustainability

#### Feasibility

- Cost
- Value for Money
- Simplicity

#### Achievability

- Likelihood of success
- Pace of delivery
- Stakeholder support

### **Recommendations**

4.57 The review has identified actions and response that industry and the regulatory authorities can take to:



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- *Making the most of all sources of food business information to improve assurance;*
- *Modernising the delivery of Official Controls;*
- *Delivering Official Controls more coherently and consistently across both central and local regulatory authorities;*
- *Providing clearer, concise guidance in co-production with food businesses on their requirements to produce safe food; and*
- *Providing a consistent and uniform people competency model for all those delivering Official Controls.*

### **Making the most of all sources of food business information**

#### **Information from Third Party Assurance Schemes**

4.58 The food industry has a range of methods to assure itself, customers and consumers that it is complying with legislation, producing food that's safe and what it says it is, complying with customer, industry, ISO and certificated (assurance scheme) standards. Third party audits, assessments and inspections are a commonly used method particularly for business to business trading. These audits including assurance scheme audits measure conformance with private standards. Unlike official controls their purpose is not to assess compliance with legislation. These private standards are drawn up to meet the needs of the schemes themselves.

4.59 Third party private assurance schemes are voluntary schemes that verify, through independent assessments, businesses are meeting stated standards. The schemes operating in the UK that are most used by industry are:

- BRC Global Standards (BRC GS) - the Global Standard for Food Safety is made up of 18 categories; 7 of these are relevant to 'meat'. An additional module: meat supply chain assurance is also of relevance;
- Assured Food Standards (AFS) – operated by Red Tractor – the Farm Standards cover primary production, 3 are relevant to meat; the Supply Chain Standards include Meat Processing;
- Safe And Local Supplier Approval (SALSA) – a scheme common in Scotland which is appropriate for smaller food producers and processors.

4.60 Other specific schemes operating in the meat processing sectors include Quality Meats Scotland - Quality Scottish Assured Processor Standard, National Association of Catering Butchers, British Meat Processors Association – BMPA Pork

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Scheme, Association of Independent Meat Suppliers – Assured Meat Processing Scheme, FSSC 22000 and SALSA.

- 4.61 The review team identified that industry assurance tends to operate in a similar manner across England, Northern Ireland, Scotland and Wales. The Agencies do not currently hold information at business or establishment level on the details of which private standards (including assurance schemes and supplier requirements) establishments are assessed against. Industry assurance data relevant to establishments in the scope of this review is not routinely shared between regulators and schemes.
- 4.62 Findings from the FBO survey indicate a high level of participation in third party assurance schemes in this part of the meat sector. In conjunction with the FSA's Regulating Our Future Programme the review team has commissioned two feasibility studies:
- A data mapping exercise to cross match publicly available data on food business in the BRC Directory with that held on FSA enforcement and assurance systems; and
  - An exercise to explore and test the value of FSA officials making use of information in BRC GS audit reports as part of official controls at cutting plants, initially as part of the official audit.

### **2 Sisters Food Group – Poultry**

- 4.63 Following the publication of the EFRA Committee report of their enquiry into 2 Sisters Food Group poultry processing operation in November 2017, we met with 2SFG to discuss how more open and transparent working could improve public confidence. The company agreed to working more effectively together and had already published the outcomes of all their regulatory and third party audits. They committed to making their CCTV footage freely available to the regulator in real time and provide on request, details of their mystery worker internal audits and any whistleblowing issues that might occur. As part of the company's drive to improve the transparency agenda they were keen to develop a more collaborative approach to providing assurance on compliance with food safety and hygiene standards.
- 4.64 After a series of initial technical design meetings an agreed set of assurance metrics and a reporting template were developed. This comprised consolidated audit results; information on customer complaints, product returns, hygiene, microbiological sampling and pest control; feedback from company mystery employer and employee whistle blower schemes; and regulatory audit and inspection results.
- 4.65 In May 2018 the Agencies and 2SFG Poultry Group began a pilot of quarterly assurance meetings to review this information and agree how it might be used to more effectively focus regulatory assurance activity. FSA/FSS Executive Management Team believe this approach could have wider application across the meat sector and are currently engaging other food businesses through their trade bodies to present this approach and discuss how it might be taken up more widely.

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4.66 The FSA Head of Field Operations attended the British Poultry Council (BPC) meeting on 13 September 2018 to engage with stakeholders. The information was positively received by the BPC CEO and four major food businesses have since contacted the FSA about taking part in this assurance activity. An introductory meeting has been set up for 2 November 2018 to begin work on this with one of these businesses.

### Local Authorities and the Agencies

4.67 There is a clear requirement for Central Competent Authorities and Local Authorities to exchange information to effectively deliver the system of Official Controls governing food hygiene, food safety and food standards. However, although there were some reported good practices at local level, this was not common practice and not supported by any standard framework to facilitate a more uniform approach. FSA/FSS can approve establishments without them being subject to LA official controls on food standards which can weaken the assurance we can provide to consumers.

4.68 Stakeholder feedback reported that an uncoordinated approach sometimes resulted in differences in interpretation and delivery of inconsistent advice to food businesses.

4.69 Feedback received from user design workshops suggested that traceability labelling was a pain point, with use of a variety of different labels, and differing terminology which was compounded in cold stores where attempting to identify product from simple visual inspection can be difficult.

4.70 In summary, the review team identified that industry assurance tends to operate in a similar manner across England, Northern Ireland, Scotland and Wales, with some variation in the assurance schemes available at a country level including those linked to the ability to use regional branding PGI and PDO origin indicators that will have distinct national incentives. Surveys of food businesses in this part of the meat sector indicate a high level of participation in third party assurance schemes and a willingness on the part of the FBOs to share this with the Agencies. The Agencies do not currently hold information at business or establishment level on the details of which private standards (including assurance schemes and supplier requirements) establishments are assessed against. Industry assurance data relevant to establishments in the scope of this review is not routinely shared between regulators and schemes.

4.71 The work the Agencies have undertaken with 2 Sisters Food Group also demonstrates the value of accessing a range of information to focus more effectively on regulatory assurance activity. This approach could have wider application across the meat sector and recommendations in this area are set out below:

- *Test the value in mapping the British Retail Consortium (BRC) Directory open information to the Agencies' data on establishments and of the Agencies' officials making use of information in BRC Global Standards (GS) audit reports as part of official controls at cutting plants;*

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- *Using the lessons learned from the Agencies and 2 Sisters Food Group information sharing initiative, we will work with industry to make more effective use of Food Business management and assurance information to focus regulatory activity more effectively;*
- *Food Businesses should embrace the greater public and customer confidence that can be generated by making available management and assurance information to regulators, for example information from DNA testing programmes. Retailers and other commercial customers should press for their producers to participate in this information sharing initiative. An industry forum should be established to progress this approach;*
- *Cold Store and Cutting Plant operators to consider reviewing their current traceability records to ensure comprehensive supply chain information is available for audit on request by the Competent Authority. It is clear that some sectors have gone above legal requirement in this regard, particularly following recent high profile incidents, and, to help secure a more consistent approach it is proposed that industry develop comprehensive traceability proposals from point of slaughter to point of sale for agreement by Competent Authorities;*
- *Where not already present, FBOs should introduce CCTV at critical points within cutting plants and cold stores even though there is no legislative requirement for them to do so. The Agencies will explore the feasibility of legislating for mandatory provision of CCTV in these premises.*

### **Modernising Official Controls**

- 4.72 Data and reports generated by FSA intervention activities including approval visits, unannounced inspections and audits are captured in different IT systems which are not always available for the officers planning to undertake a visit. The need for quick, clear and accessible data available to the Agencies/LA officials to report outcomes from their activity is critical to the effective delivery of Official Controls, whilst providing a high quality and consistent level of service to food businesses and other delivery partners. This approach is supported by the FSA Data Strategy which states that *“We want to make access to information easy, immediate and supported by the necessary tools and expertise...we want our Agency colleague to be able to use the data they work with to its maximum effect”*.
- 4.73 Feedback from the Agencies staff workshops indicated that communications between FSA inspection and audit functions could be more consistent and better co-ordinated.
- 4.74 Stakeholders raised FSA incidents management as an area for improvement stating that the current process is costly and disruptive with a lack of a communications planning causing problems for FBOs.

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4.75 In summary, the review identified several opportunities to modernise the delivery of Official Controls to make better use of new technology, and coordinate delivery of Official Controls more effectively to optimise value for money and improve levels of industry compliance. FSS has made a number of improvements to the way in which approvals, unannounced inspection and FBO audit activities are co-ordinated and similar opportunities could also be explored by the FSA particularly in relation to the approvals process in England and Wales. In summary, the recommendations under this theme are to:

- *Integrate the current FSA approvals activity into a single, unified team within FSA Operations Group<sup>11</sup>;*
- *Digitally enable the Agencies' approval processes to facilitate more customer interactions to be completed, submitted and tracked as part of a more on-line case management system: and*
- *Reassess the FSA's Major Incident Plan to align with other elements of the Official Controls framework, in particular in relation to effective coordination and communication with LAs and responsibility for assuring delivery of incident follow-up actions<sup>12</sup>.*

### **Delivering Official Controls More Coherently and Consistently**

4.76 In areas where LAs and the Central Competent Authorities (CCA) share enforcement responsibility, feedback from stakeholders (both LAs and food businesses) was that effective communication and coordination presented real challenges to the effective consistent delivery of official controls and there were examples quoted of conflicting advice being given to food businesses. Some respondents also felt there needed to be greater clarity on the split of responsibilities and a consistent understanding of each organisations role.

4.77 This is particularly the case in approved cutting plants where the Agencies are responsible for food hygiene and LAs are responsible for food standards. In England, coordination is also a potential issue in LA registered cutting plants and LA approved cold stores, particularly where different LAs are responsible for hygiene and standards. This is not the case in Scotland, Wales and NI where unitary authorities deliver both hygiene and standards official controls. Some LAs commented that consideration should be given to minimising the need for dual/multiple enforcement responsibilities in a single business.

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<sup>11</sup> FSS have this in place

<sup>12</sup> FSS reviewed their Major Incident Plan in May 2018

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*Having so many agencies involved in the supply chain means intelligence and standard of approach can be disjointed and inconsistent ..... From a business perspective having so many overlaying regulatory bodies is unnecessarily complex, inefficient and sometimes inconsistent despite having one regulatory framework..... navigating this complex web is costly in terms of both time and money, which in itself creates a barrier for compliance. Simplifying the regulatory overlap should be a key outcome from this review'*

*Quote taken from the Phase 1 LA Survey*

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- 4.78 These concerns are compounded by the weekly tonnage threshold for cutting plants which determines whether a business was LA registered (below the threshold) or the Agencies have approved (above the threshold). Respondents specifically referenced the challenge in relation to businesses operating at or around the threshold and the potential for moving between the registration and approval requirement. They also asked that the current threshold be reviewed.
- 4.79 To summarise, areas where LAs and the Agencies share enforcement responsibility, feedback from stakeholders (both LAs and food businesses) was that effective communication and coordination presented real challenges to the effective consistent delivery of Official Controls and there were examples quoted of conflicting advice being given to food businesses.
- 4.80 The outcome of LA risk assessment in accordance with the Food Law Codes of Practice often resulted in cold stores and other meat establishments being categorised as lower risk for hygiene and standards, leading to an inspection period of 2 years or longer. There is insufficient guidance on the conduct of audits and inspections in cold stores and some concerns about the role of agents and brokers and the potential implications for the durability and authenticity of frozen meat.
- 4.81 To improve the overall consistency and coherence of delivery of Official Controls within cutting plants and cold stores we recommend:
- *Further work to assess the role of agents and brokers of meat and the controls applied at this part of the food distribution network;*
  - *Incorporating all FSA inspection and audit activity into a single resource scheduling system, and integrating cutting plant inspection and audit activity (including reporting) to improve coordination and consistency of delivery and provide improved level of assurance;*
  - *Updating the Agencies' Intervention approach to clarify roles and responsibilities and set standards for timely and adequate enforcement action when deficiencies are identified, particularly in relation to the intervention approaches in cutting*

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*plants and cold stores and reflect any changes in Food Law Codes of Practices and Manual for Official Controls;*

- *Inviting a small, representative number of LAs to participate in a trial to evaluate the use of single organisation to deliver all Official Controls in a geographic location.*

### **Providing Clearer and More Comprehensive Guidance**

- 4.82 The Regulations establish that primary responsibility for food safety rests with the food business operator. It is therefore the responsibility of each business operator to ensure that food safety is not compromised by establishing food safety programmes based on the HACCP principles, together with the application of Good Hygiene Practice.
- 4.83 The Guidance on the approval process is set out in the Manual of Official Controls in England, Wales and Northern Ireland and in standalone guidance in Scotland. There is no specific mention of assessing compliance with requirements relating to durability marking. As a consequence, there is considerable variation in the way in which durability is documented on product labels – one food business quoted 13 different ways of expressing durability.
- 4.84 There is a comprehensive framework of guidance in place for LAs relating to food businesses. The guidance focus predominantly on hygiene issues. There is no specific guidance on checks that should be carried out in cold stores following their approval.
- 4.85 EU regulations require Member States to encourage the development of national guides to good practice for hygiene and for the application of HACCP principles. When national guides to good practice are developed, they shall be developed and disseminated by food business sectors in consultation with representatives of parties whose interests may be substantially affected, such as competent authorities and consumer groups; and having regard to relevant codes of practice of the Codex Alimentarius.
- 4.86 There are many good examples of industry taking responsibility for the development of good practice guides to supplement the legislative regulatory framework, for example, in Scotch Malt Whisky, Pet Food and Specialist Cheese production. Stakeholders were generally supportive of this approach in the meat sector too as it would allow the Central Competent Authorities to focus on producing clearer communications on the legislative requirements, whilst giving the industry a greater role in helping to assure good practice in food businesses across the meat sector.
- 4.87 In summary, good guidance is an important element in supporting and enabling FBO compliance with regulatory requirements and the consistent and effective delivery of Official Controls. Clear, consistent instructions for Authorised Officers not only to provide process information but also to ensure all players including FBOs fully understand their roles and responsibilities in each of those processes.

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- 4.88 Feedback received from stakeholders suggested that current guidance is too complex and ambiguous resulting in confusion for FBOs between what is legislation, guidance and advice. It was also raised that there is some inconsistency in advice and the interpretation of legislation by the difference roles involved.
- 4.89 Although there is a comprehensive framework of guidance available to Authorised Officers delivering Official Controls and FBOs, most of the guidance focuses predominantly on hygiene issues, rather than the bigger picture associated with food safety management systems. There is scope for more guidance to fully inform and support Authorised Officers and FBOs in FSA/FSS approved establishments in areas such as durability, labelling and traceability. There is also a need for specific guidance on checks that should be carried out on cold stores following their approval.
- 4.90 Stakeholders were generally supportive of the idea that ownership of the Meat Industry Guide be transferred to the meat sector as it would allow the Central Competent Authority to focus on producing clearer communications on the legislative requirements, whilst leaving the industry to produce good practice to support food businesses. Further work is to be undertaken between the Agencies and industry in this regard to agree effective regulatory input / oversight where required.
- 4.91 Recommendations to address this theme are:
- *Industry representative bodies to assume responsibility for the Meat Industry Guide as set out in EU regulations and to further ensure it reflects requirements of the Manual for Official Controls. Further work is required to clarify the regulatory input and oversight;*
  - *Reconsider and update procedures for Authorised Officers responsible for Approvals, enforcement, inspections and audit of cutting plants and cold stores;*
  - *Update, organise and index guidance and legislation for hygiene and standards inspections using the Agencies' repositories, prioritising any required updates to guidance on durability, labelling and traceability; and*
  - *Work with industry, Westminster Government and the devolved administrations to introduce a more standardised approach to the wording of durability on product labels and require food businesses throughout the meat supply chain to adopt that approach. If necessary, we will propose legislation to mandate this requirement.*



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### **Developing a People Competency Model**

- 4.92 The review assessed the skills and experience requirements for job roles delivering Official Controls across FSA/FSS, including service delivery partners. The scope included the competency, skills, training and qualifications of Officers involved in approvals, audit, UAIs, Official Veterinarians (OV) discharging enforcement responsibilities and Employed or Contract/ MHI's conducting reality checks and discharging enforcement responsibilities.
- 4.93 LA competencies were not included in this assessment because the Food Law Codes of Practice (Chapter 4) includes the requirements for the minimum qualifications, competence and experience required by a Local Authority Authorised Officer in order to carry out official controls in food businesses. Specifically, it says that an Authorised Officer must have a level of knowledge, skills, experience and understanding that allows them to deliver official control interventions. They must also understand the hazards and risks within the premises they are required to inspect. The Code of Practice also requires every LA to appoint a Lead Food Officer who has responsibility for assessing the qualifications and competence of an officer before they are authorised to deliver official controls.
- 4.94 Findings identified a lack of consistency across the four countries regarding training provision and qualifications of staff carrying out specific roles. OV courses are solely designed to meet legislative requirements under EU Reg 854/2004 and course content on cutting plants requirements is minimal. Learning and development of OVs in the cutting plants is largely based on experience. The OV role has diversified in some parts of the UK into new areas such as incident management and investigations and as the role continues to diversify it is important that the formal OV courses also develop.
- 4.95 There is also a lack of 'horizon scanning' to enable training to focus on emerging issues. Internal monitoring, as required by EU Regulations and competency assessments of staff was not consistently carried out across the four countries. A recent internal audit of the Competent Authority Official role in HACCP at approved establishments reported that although Officials have the knowledge and experience, there is room for improvement in respect to officials carrying out verification of the FBO HACCP system and carrying out greater scrutiny of FBO's FSMS.
- 4.96 Figure 11 sets out an overview of each Authorised Officer role.

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**Figure 11: Overview of Authorised Officer Roles**

Role	Overview
Approval Officers	<ul style="list-style-type: none"> <li>• There is a consistent level of appropriate qualifications (OV) and experience across all countries.</li> <li>• All FSA NI and FSS officers conducting conditional and final approvals are qualified to Level 4 HACCP or equivalent.</li> <li>• FSA has an experienced senior management cohort of Field Veterinary Leaders with significant experience, some of whom are Level 4 HACCP qualified.</li> <li>• All staff conducting approvals in England, Wales and NI are employed by FSA. FSS have recently contracted out the function.</li> <li>• There is some evidence of internal monitoring of approvals activity and a significant reliance is placed on the experience of staff as opposed to monitoring their current delivery.</li> </ul>
Auditors	<ul style="list-style-type: none"> <li>• In England and Wales Veterinary Auditors (VA) are employed by FSA and audits are conducted by either a VA or Audit Veterinary Leaders (AVL) in cutting plants. AVLs have extensive auditing and veterinary management experience and plant OV background.</li> <li>• Currently VAs have a minimum of 3 years audit experience and 5-10 years OV experience.</li> <li>• In England, Scotland and Wales VAs are Level 4 HACCP and in Scotland are Official Control Verification (OCV) trained and have held OV veterinary delivery positions for 5-10 years.</li> <li>• FSA NI is rolling out HACCP Level 4 to its auditor cohort. All countries recruit auditors at level 3 HACCP and train to level 4 and expect Lead Auditor qualifications.</li> </ul>
UAI Officers	<ul style="list-style-type: none"> <li>• Training of MHI UAI Officers commenced to a common standard in 2014 and this included enforcement, inspection and reporting. In England and Wales all UAI officers are directly employed OVs or UAI MHIs supplemented by staff supplied by the SDP.</li> <li>• In NI all staff conducting UAIs are employed by DAERA and in Scotland all UAIs are conducted by employed UAI MHIs other than in ready to eat plants where they are delivered by OVs employed by the SDP.</li> <li>• FSS staff are level 3 or 4 HACCP, OCV, investigator and OC micro sampling qualified and some are trained forensic investigators. SDP staff are OVs with level 3 HACCP.</li> <li>• There is a bi-annual refresher training plan and an annual assessment by a veterinary manager who also verify all reports and enforcement action.</li> <li>• There is currently a pilot of new posts for UAI and incidents leads within the FSA England and Wales Operational Delivery structure. Candidates require extensive UAI experience.</li> </ul>
OVs	<ul style="list-style-type: none"> <li>• The different delivery models across the UK utilise OVs for a variety of functions in cutting plants.</li> <li>• For all ready to eat establishments OVs conduct all official controls including UAIs.</li> <li>• In Scotland OVs are specifically deployed to conduct partial audits and take follow up enforcement action after audit. All OVs are MRCVS and those employed by SDPs are assessed as competent by the SDP before being deployed.</li> <li>• At this time there is no independent verification of competency by FSS/FSA of SDP staff.</li> </ul>
MHIs	<ul style="list-style-type: none"> <li>• Historically MHIs have had limited roles in cutting plants, unless directed by the OV but this has changed within the last year in co-located cutting plants.</li> </ul>

4.97 FSS have recently developed a training package for all MHIs who are being integrated into the system of reality checks in co-located cutting plants.

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4.98 Feedback from user design workshops supported the design of a national training programme to improve the consistency of advice given to FBOs and for enforcement of non-compliances. Stakeholders wanted to see training of all inspectors in all regulators to a high and consistent standard. Authorised Officers carrying out unannounced inspections would benefit from appropriate training packages including conflict resolution and Level 4 HACCP.

4.99 The common theme was that the regulatory staff need to be competent and consistent. Stakeholders also wish to see the Competent Authority deploy dedicated case officers during incidents which may highlight a further training need that is out with the scope of this workstream.

4.100 The effectiveness of businesses food safety management systems and the delivery of Official Controls is predicated on having competent, appropriately trained staff. Although there is some evidence of good practice in the recruitment and training of staff there is scope to improve consistency in industry and the regulators alike and to improve the sharing of learning and development between the Agencies and LAs.

4.101 Recommendations to address this theme are

- *All Authorised Officers responsible for delivering Official Controls should be recruited against a common standard across the UK with the appropriate professional skills, experience and qualifications appropriate to their role. There should be on-going development programmes to address emerging issues and regular verification of officer competence. To achieve this it is proposed to develop a standard competency matrix for all job roles with responsibility for delivering Official Controls to underpin recruitment, performance management/internal monitoring, training, contract specifications and development of any future accreditation approach. As a minimum all such staff would be required to have HACCP Level 4 certification;*
- *FBOs to have at least one person (staff member or contracted support) as a minimum with adequate training in the application of HACCP principles. Good practice already mandates intermediate certificate level in HACCP Practice for meat plants however it is clear from recent incidents that this is insufficient, and at least one member of staff should be trained to Level 4 with all other food handlers trained to Level 2 as a minimum. (Clearly this recommendation could have a significant impact on micro-businesses and further work is required between the Agencies and industry to consider thresholds / proportionality depending on the size of an FBO); and*
- *Develop centralised Agency databases to hold FSA/FSS Authorised Officer qualifications and training records, training materials and review and update existing training material to incorporate inspection and audit requirements for Cutting Plants and Cold Stores.*

## 5 Overall summary of recommendations

5.1 Please see below a summary of the recommendations of the review split by proposed timescales for delivery.

### Short Term (0-6 months)

Recommendations		Countries recommendation applies to			Responsible for delivery
		England & Wales	Northern Ireland	Scotland	
1	<i>Integrate the current FSA approvals activity into a single, unified team within FSA Operations Group.</i>	✓		Already in place	FSA
2	<i>Reassess the FSA's Major incident plan to align with other elements of the Official Controls framework, in particular in relation to effective coordination and communication with LAs and responsibility for assuring delivery of incident follow-up actions.</i>	✓	✓	New plan in place	FSA
3	<i>Updating the Agencies' Intervention approach to clarify roles and responsibilities and set standards for timely and adequate enforcement action.</i>	✓	✓	✓ Currently piloting	FSA/FSS
4	<i>Update procedures for Authorised Officers responsible for Approvals, enforcement, inspections and audit of cutting plants and cold stores;</i>	✓	✓	✓	FSA/FSS
5	<i>Industry should encourage Food Businesses to participate in the information sharing initiative, which 2 Sisters Food Group have trialled with the Agencies</i>	✓	✓	✓	Industry
6	<i>Commission further work to assess the role of agents and brokers of meat and the controls applied at this part of the food distribution network.</i>	✓	✓	✓	FSA/FSS
7	<i>Invite a small, representative number of LAs to participate in a trial to evaluate the use of single organisation to deliver all Official Controls in a geographic location</i>	✓	✓	✓	FSA/FSS/ LAs

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Medium Term (6-18 months)

Recommendations		Countries recommendation applies to			Responsible for delivery
		England & Wales	Northern Ireland	Scotland	
8	<i>Test the value in mapping the British Retail Consortium (BRC) Directory open information to the Agencies' data on establishments and of the Agencies' officials making use of information in BRC Global Standards (GS) audit reports as part of official controls at cutting plants</i>	✓	✓	✓	FSA/FSS
9	<i>Cold Store and Cutting Plant operators should review their current traceability records to ensure comprehensive supply chain information is available for audit on request by the Competent Authority</i>	✓	✓	✓	Industry
10	<i>Integrate cutting plant inspection and audit activity to improve coordination and consistency of delivery and provide improved level of assurance.</i>	✓	Partially in place	✓	FSA/FSS
11	<i>Industry representative bodies to assume responsibility for the Meat Industry Guide as set out in EU regulations and to further ensure it reflects requirements of the Manual for Official Controls. Further work is required to clarify the regulatory input and oversight.</i>	✓	✓	✓	Industry
12	<i>Update, organise and index guidance and legislation for hygiene and standards inspections using the Agencies' repositories, prioritising any required updates to guidance on durability, labelling and traceability.</i>	✓	✓	✓	FSA/FSS
13	<i>Develop centralised Agency databases to hold FSA/FSS Authorised Officer qualifications and training records, training materials and review and update existing training material to incorporate inspection and audit requirements for Cutting Plants and Cold Stores.</i>	✓	✓	✓	FSA/FSS
14	<i>Demonstrating greater transparency by making management and assurance information available to regulators, for example, information from DNA testing programmes in relation to authenticity</i>	✓	✓	✓	Industry
15	<i>Ensuring at least one member of staff (directly employed or contracted) should be trained to HACCP Level 4 with all other food handlers trained to Level 2 as a minimum</i>	✓	✓	✓	Industry

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Longer Term (+18 months)

Recommendations		Countries recommendation applies to			Responsible for delivery
		England & Wales	Northern Ireland	Scotland	
16	<i>Digitally enable the Agencies' approval process to facilitate more customer interactions to be completed, submitted and tracked as part of a more on-line case management system.</i>	✓	✓	✓	FSA/FSS
17	<i>Develop a standard competency matrix for all job roles with responsibility for delivering Official Controls to underpin recruitment, performance management/internal monitoring, training, contract specifications and development of any future accreditation approach. As a minimum all such staff would be required to have HACCP Level 4 certification.</i>	✓	✓	Partially in place	FSA/FSS
18	<i>Introducing CCTV at critical points within cutting plants and cold stores even though there is currently no legislative requirement for them to do so</i>	✓	✓	✓	Industry
19	<i>Work with industry, Westminster Government and the devolved administrations to introduce a more standardised approach to the wording of durability on product labels and require food businesses throughout the meat supply chain to adopt that approach. If legislation is required we will work with industry and Defra to develop the legislation to mandate this requirement.</i>	✓	✓	✓	FSA/FSS/ Industry

## 6 Future delivery and next steps

- 6.1 Both Agencies already have modernisation programmes in place for regulatory delivery and assurance and we will agree with those programmes the recommendations from this review that will be implemented by them. Any remaining recommendations will be delivered through operational delivery programmes of work in each country. Implementation will be overseen by the respective executive management teams of FSA and FSS undertaking joint progress reviews quarterly to provide assurance that implementation is on track and overall outcomes are being delivered. These reviews will be supplemented by an independent post-implementation review (PIR), to evaluate the effectiveness of the conduct of the review and the implementation approach. We will approach the Cabinet Office Infrastructure and Projects Authority (IPA) to undertake this PIR.
- 6.2 We propose FSA/FSS deliver the recommendations through the following main delivery channels:
- The FSA Regulating our Future (RoF) programme where the recommendation is within the existing programme scope;
  - An FSS implementation plan to be developed further to FSS Board agreement on the recommendations applicable in Scotland;
  - As part of operational delivery programmes of work in each country;
  - Monitoring the contributions of regulators and industry to realising the recommendations.
- 6.3. Our preliminary analysis of these recommendations suggests that their financial impact on businesses and regulators is minimal and can be absorbed within existing resource allocations and estimates, and through recycling savings from more cost-effective delivery. Phase 3 of this work will involve more detailed implementation plan for delivery including a fuller assessment of any financial implications; and a benefits realisation plan which baselines and measures the improvements expected.
- 6.4 Implementation is in proposed phases to minimise delivery risk, manage resource capacity and ensure relevant stakeholders have time to adjust to the changes, taking account of factors such as the complexity of implementation, degree of alignment with modernisation programmes and contribution to reduction in risk to food safety.

## 7 Conclusions

- 7.1 Although this review was triggered by UK meat related incidents, the UK meat industry produces meat considered by many to be amongst the safest in the world. There is a comprehensive framework of legislation and guidance available to food businesses in supporting them in their obligation to produce safe, hygienic, and authentic food which abides by high welfare standards. The industry bodies' commitment to work collaboratively with the regulator to improve compliance and overall standards was evident from the levels of stakeholder engagement during this review, particularly through participation in User Design workshops and face-to-face meetings.
- 7.2 However, this commitment needs to translate into tangible improvements through the adoption of these recommendations. Consumers need to see visible evidence that food businesses are prioritising food safety as part of their overall management culture which will drive improvements in public confidence in the meat industry.
- 7.3 In addition, the review has highlighted areas for improvement by both the Central Competent Authorities (FSS and FSA) and LAs, which should be implemented to add further to the safety of meat produced for human consumption within the UK.



## 8 Board Approval

- 8.1 On Wednesday 17 October 2018 the Boards of the Food Standards Agency and Food Standards Scotland held their first joint meeting in Edinburgh following the publication of the Review report. They considered the report evidence and the 19 recommendations and separately agreed the improved ways of working for their respective countries.
- 8.2 Full details of the meeting and a recording of the discussion are available on the websites of the FSA and FSS at [www.food.gov.uk/about-us/fsa-and-fss-joint-board-meeting-october-2018](http://www.food.gov.uk/about-us/fsa-and-fss-joint-board-meeting-october-2018) and [www.foodstandards.gov.scot/publications-and-research/publications/fss-board-meeting-17-october-2018](http://www.foodstandards.gov.scot/publications-and-research/publications/fss-board-meeting-17-october-2018)
- 8.3 Following a discussion welcoming the Review and the stakeholder engagement over the previous six months, each Board fully endorsed the recommendations for their respective countries. They also highlighted the important role that the external Challenge Group played in ensuring that the review achieved its objectives.
- 8.4 Both Boards stressed the importance of food business management culture in successfully implementing these recommendations to secure improvements in food safety and food standards in the UK meat sector and the need to keep consumer interests at the forefront. It was also highlighted that there is an onus on the industry as well as regulators to be ambitious in implementing the plans, and collaborative work will continue to achieve this.
- 8.4 Throughout the discussion, the Boards recognised that the majority of the UK meat sector does act responsibly and that many food businesses go above and beyond regulatory requirements. The organisations will continue to work closely to develop a common UK approach and will develop their own detailed implementation plans, which will be subject to oversight by their respective Boards.
- 8.5 Both boards formally accepted all the recommendations that were made for each organisation.

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Annex 1: Review Terms of Reference

<b>Purpose</b>	To review meat cutting plants and cold stores
<b>Business Sponsor</b>	Heather Hancock (FSA), Ross Finnie (FSS) Jason Feeney (FSA), Geoff Ogle (FSS)
<b>Review Team Leader</b>	Simon Dawson, FSA Head of Operations Assurance
<b>Date</b>	26 <sup>th</sup> February 2018

<b>Background</b>
<p>The Food Standards Agency (FSA) and Food Standards Scotland (FSS) have announced that they will be undertaking a review of meat cutting premises and cold stores. This comes in the wake of non-compliance issues identified at various cutting plants and will be industry wide.</p> <p>Slaughterhouses, Cutting Plants and Game Handling Establishments require veterinary control in accordance with Regulation (EC) No 854/2004 and must be approved by the FSA in England, Wales and Northern Ireland and by FSS in Scotland.</p> <p>Cutting plants do not require veterinary control on a daily basis and are inspected through periodical and unannounced visits by the FSA, FSS or Local Authorities. They are also audited by the FSA/ FSS in accordance with Regulation (EC) No 854/2004. A risk based approach is used to determine the frequency. Many will also be members of assurance schemes such as Red Tractor and BRC who conduct their own inspections.</p> <p>Cutting plants are wholesale/retail/catering butchery establishments engaged only with the cutting of meat and boning out of carcasses. Cutting plants can also be approved for cold storage and to produce minced meat, meat preparations and/or meat products, in addition to being approved to cut meat.</p> <p>Cold storage refers to the activity of storing food which has not been produced in the establishment where the storage (under temperature control) is taking place. These establishments are approved by the local authorities.</p> <p>FSA/FSS wish to assess how today's meat industry operates across the whole supply chain, including the cause and effect of shifts in the economics of the industry, and how it might continue to change, to ensure that the future regulatory direction keeps pace with and anticipates sector changes.</p>
<b>Scope</b>
<ul style="list-style-type: none"><li>• All meat establishments in scope, including those under Local Authority enforcement responsibility as well as those under FSA/FSS control. This includes both stand alone and co-located premises.</li></ul>

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

- All types of establishments - Red, White and Game Meat
- The review will encompass:
  - Legislative framework and guidance;
  - Policy, procedures, and process relating to delivery of official controls;
  - Respective roles and responsibilities of all actors in the meat supply chain - including all food businesses, regulators, assurance and standards bodies;
  - End to end process from approval to withdrawal – whole food chain approach; and
  - Incidents management process.
- The review will include an overall assessment of the capacity and capability of assurance framework including a delivery competency assessment.

For clarity the following areas are out of scope:

- A detailed review of the scientific evidence underpinning the delivery of controls in cutting plants and cold stores, although feedback on the scientific evidence may inform findings and recommendations for further work.
- EU Exit – although any appraisal of options will take into consideration any potential impact of exiting the EU.

### **Objectives/ Deliverables/Success Criteria**

#### Objectives

- To clearly articulate how the meat industry currently operates across the whole supply chain, identify areas which pose greatest risk to public health and food safety, and better understand factors influencing food business compliance behaviour.
- To clearly and concisely document the current official control delivery arrangements for FSA, FSS and LAs in cutting plants and cold stores, identify opportunities for improvement and make recommendations for change.
- To improve public and stakeholder confidence in the overall effectiveness of the regulatory and assurance framework governing hygiene and public health standards in Cutting Plants & Cold Stores.
- To demonstrate FSA/FSS commitment to deliver improvements as excellent, modern accountable regulators.
- To strengthen the arrangements for delivery of official controls so that they are more effective in identifying non-compliance or potential non-compliance issues and ensures corrective action is taken before escalation to an incident.
- To identify any other measures that strengthen consumer confidence in meat production.

#### Deliverables

- Document 'As Is' model.
- Identify a range of options for change, including potential for more effective use of data to inform better regulation.
- Comparative analysis of the arrangements in place in the 4 countries (Wales, Scotland, Northern Ireland and England).

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

- Dependency mapping with other change initiatives – eg EU exit, FSA Regulating our Future programme, FSS Regulatory Strategy, Future Surveillance Model.
- Agree assessment criteria for appraising options.
- Options appraisal.
- High Level delivery plan for agreed options.
- Evaluation framework to assess effectiveness of agreed options.
- Report to FSA/FSS Boards by June 2018.

### Success criteria

- Agreed options secure broad support of stakeholders.
- Options and preferred route must be deliverable and affordable.
- Provide assurance regarding Operational controls to international bodies eg Sante F and 3<sup>rd</sup> countries.

### Approach

- Mobilise small core team, with wider network of subject matter experts.
- Split work into workstreams – agree requirements for each workstream.
- Weekly checkpoint meetings with SRO(s).
- Map the current model end to end, adopt the RoF operating model developed for the wider review of official controls as a framework.
- Review history of official controls including lessons learned from relevant incidents.
- Risk assessment and identify gaps where any improvements could be made.
- Develop options using a combination of workshops, listening events and on-line collaboration tools.
- Appraise options against operating model.
- Develop recommendations.
- Evaluate approach.

### Governance and reporting

- Accountable to FSA/FSS Boards – initial findings to be presented in June with final recommendations and delivery plan presented in September 2018.
- FSA SRO – Colin Sullivan, FSS SRO – Ian McWatt.
- Project Board will consist of subset of FSA Executive Team (Jason Feeney, Colin Sullivan, Maria Jennings, Michael Wight) and Geoff Ogle and Ian McWatt from FSS - fortnightly progress reports from SRO and regular updates to FSA and FSS Board Chairs from CEO's.
- A Challenge Group of external members (from outside the food sector) will be established to complement the Project Board by providing scrutiny, challenge and an external perspective.
- Review Management Team Checkpoints – core team drawn from across FSA/FSS to provide day-to-day oversight and support.
- Split into workstreams – including SME's in each stream.

### Communications and Stakeholder Engagement

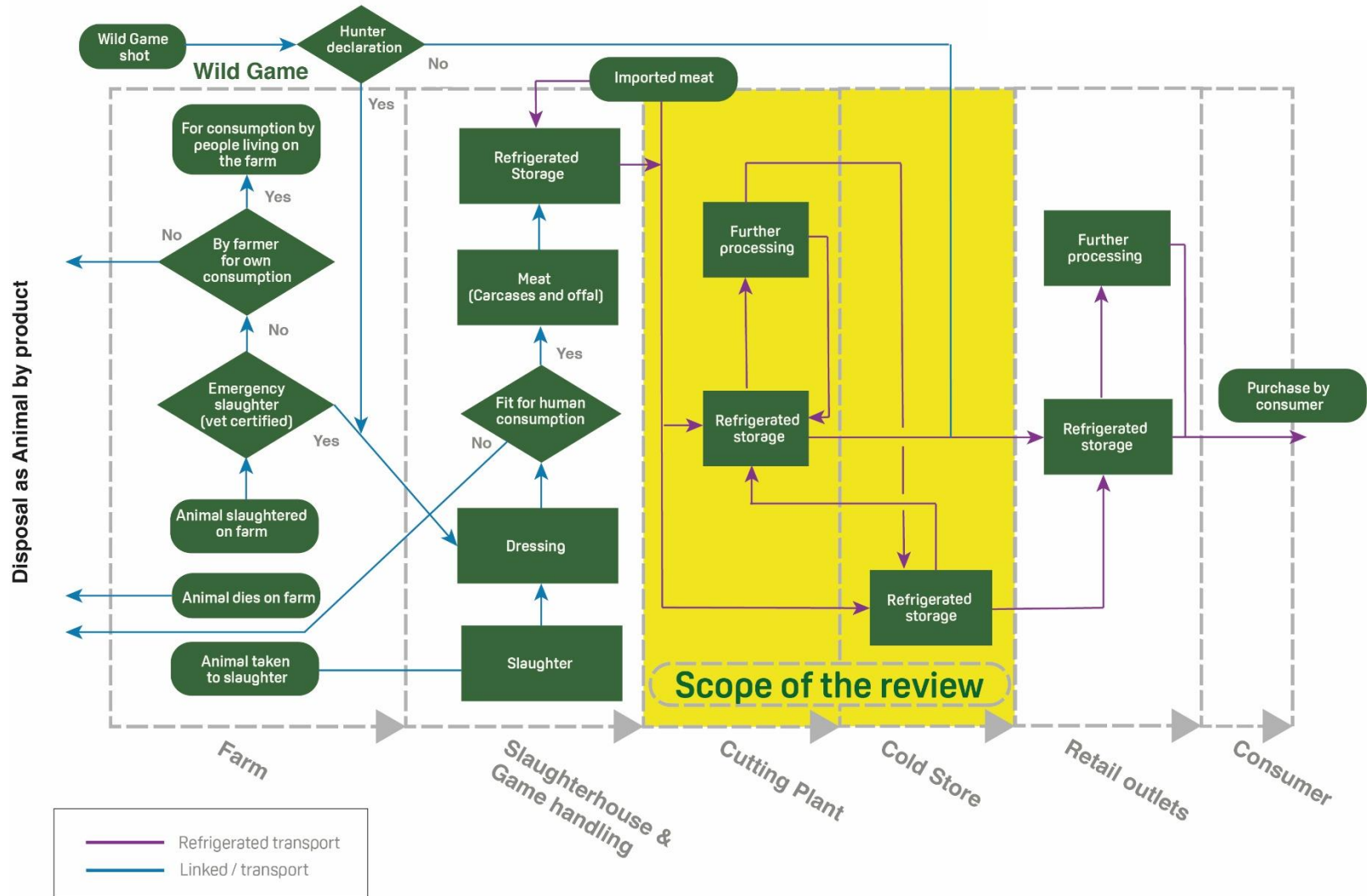
## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

- Stakeholder Mapping and Communications Plan to be developed.
- Stakeholder mapping to include segmentation analysis to secure feedback from across the whole meat supply chain – including producers, meat processors, brokers, assurance schemes, standards bodies and regulators.
- FSA is committed to transparency and will provide regular updates on review progress and findings during the review.

High Level Milestones	BY
<ul style="list-style-type: none"> <li>• Develop approach and scope of reference</li> <li>• Agree review governance arrangements</li> <li>• Mobilise review team - agree approach and delivery plan</li> </ul>	End Feb 2018
<ul style="list-style-type: none"> <li>• Evidence gathering</li> <li>• Engage stakeholders</li> </ul>	March 2018
<ul style="list-style-type: none"> <li>• Options and appraisal</li> <li>• Engage stakeholders (proposals)</li> <li>• Develop emerging findings</li> <li>• Impact assessment</li> </ul>	April 2018
<ul style="list-style-type: none"> <li>• EFRA Select Committee update</li> </ul>	May 2018
<ul style="list-style-type: none"> <li>• Initial findings report to FSA/FSS Boards</li> </ul>	June 2018
<ul style="list-style-type: none"> <li>• Final recommendations, evaluation framework and implementation plan to FSA/FSS Boards, including piloting proposals</li> </ul>	Sep 2018
<ul style="list-style-type: none"> <li>• Consultation</li> <li>• Implementation</li> <li>• Evaluation</li> </ul>	TBD

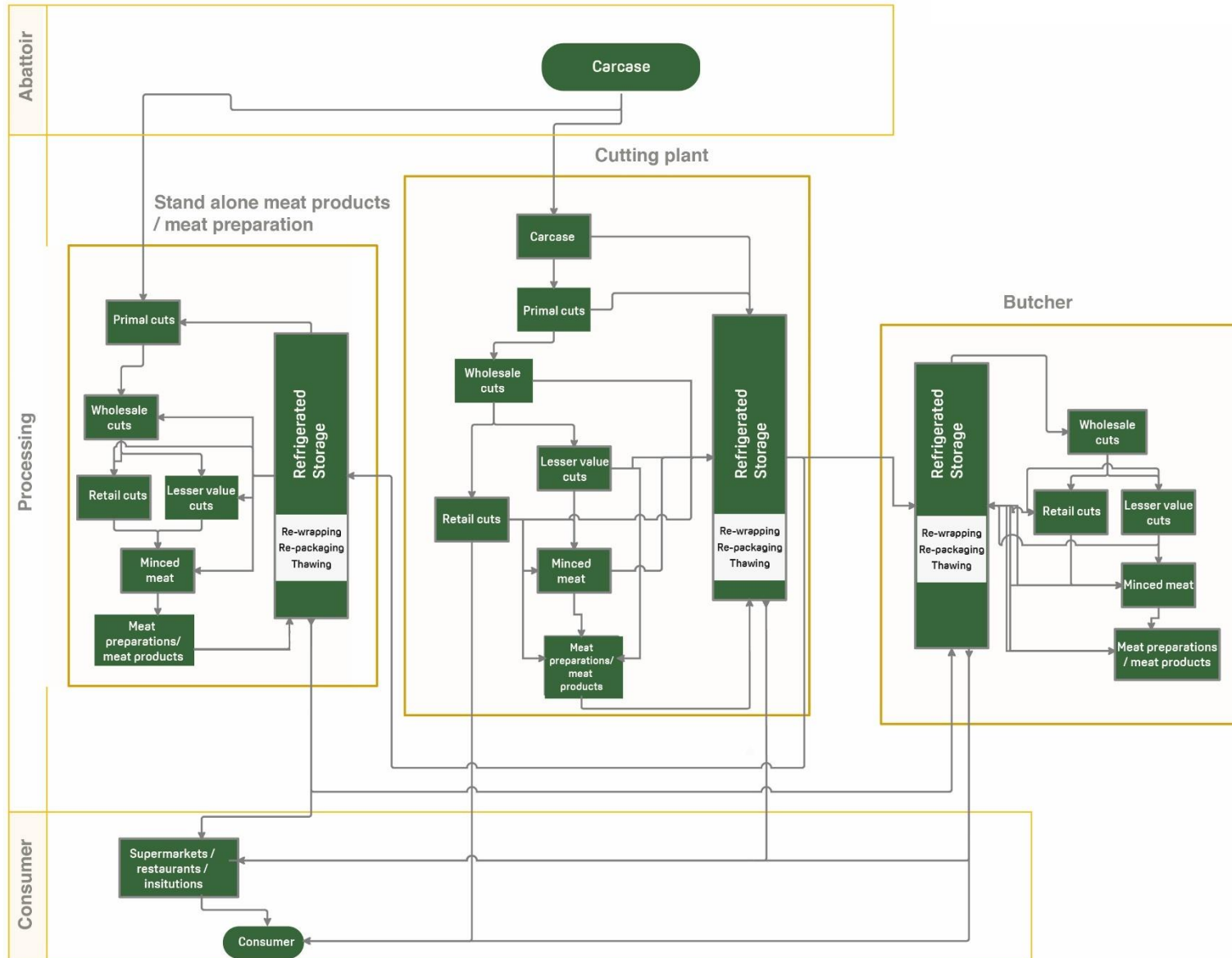
**Annex 2: Overview of the food supply chain and the scope of this review**

Meat Distribution Chain - Overview



# REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

## Meat Distribution Chain - Detailed Overview



## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Annex 3: List of stakeholders

As part of the review process we contacted all 419 Local Authorities in the UK and 325 Food Business Owners to seek their views.

Below is a list of the organisations we have engaged with in an additional capacity as part of the review process:

2 Sisters Food Group	Department for Environment, Food and Rural Affairs
Aberdeen City Council	Department of Agriculture, Environment and Rural Affairs (Northern Ireland)
ABP UK	Dunbia
Agriculture and Horticulture Development Board	Eville and Jones
Aldi Ltd	Farm Assured Welsh Livestock
Anglesey County Council	Farmers Union Wales
AP Jess Ltd	Food and Drink Federation
Armagh City, Banbridge and Craigavon Borough Council	Food and Drink Federation Scotland
Association of Chief Trading Standards Officers	Food Storage & Distribution Federation
Association of Independent Meat Suppliers	Glasgow City Council
Association of Licenced Multiple Retailers	Granville Food Care Ltd
Association of Meat Inspectors	Gwynedd County Council
Assured Food Standards	Hallmark Scotland
Birmingham City Council	Hallmark VCS
BMPA Legislation and Technical Advisory Committee	Hampshire Game
BRC Global Standards	Harrogate Borough Council
Bristol City Council	Horsham District Council
British Frozen Food Federation	Hospital Caterers Association
British Meat Producers Association	Hybu Cig Cymru – Meat Promotion Wales (HCC)
British Poultry Council	IMS of Smithfield
British Retail Consortium	Institute of Food Science and Technology
British Veterinary Association	International Meat Trade Association
Caerphilly County Council	John Sheppard Butchers Ltd
Ceredigion County Council	Lidl UK
Chartered Institute of Environmental Health	Lisburn and Castlereagh City Council
Chartered Trading Standards Institute	Local Government Association
Chilled Food Association	London LA Approvals Sub Group
Cornwall Council	Meat Promotion Wales
Cranswick Country Foods	Merthyr Tydfil County Council
Cutting Edge Services	Michael Malone of Edinburgh Ltd
Dalehead Foods	Mid & East Antrim Borough Council
	Mitchells & Butlers



## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

Monmouthshire County Council  
Moy Park Ltd  
National Association of Catering Butchers  
National Beef Association  
National Farmers Union  
National Farmers Union Scotland  
National Federation of Meat and Food Traders  
National Food Hygiene Focus Group  
National Food Standards and Labelling Focus Group  
National Pig Association  
National Trading Standards Board  
Nationwide Caterers Association  
Newby Foods Ltd  
Newport City Council  
NFS International  
Nigel Fredericks Limited  
Norfolk County Council  
Norfolk Regional LA Food Safety Group  
North East Lincolnshire Council  
North Yorkshire County Council  
Northern Ireland Meat Exporters Association  
Northern Ireland Pork & Bacon Forum  
Northern Ireland Food Advisory Committee  
Owen Taylor & Sons Ltd  
Partnership Working Group  
Pembrokeshire County Council  
Powys County Council  
Provtrade  
Quality Meat Scotland  
Robertson's Fine Foods  
Rother & Wealden District Council  
Royal College of Veterinary Surgeons  
Royal Environmental Health Institute for Scotland  
RSPCA Assured  
Safe and Local Supplier Approval  
SALSA  
Samworth Brothers Ltd  
Sandwell Metropolitan Borough Council  
Sandyford Abattoir  
Scotland Food & Drink  
Scott Brothers  
Scottish Association of Meat Wholesalers  
Scottish Craft Butchers  
Scottish Federation of Meat Traders Association  
Scottish Food Enforcement Liaison Committee  
Scottish Government  
Scottish Grocers Federation  
Scottish Pig Producers  
Scottish Retail Consortium  
Slough Borough Council  
Society of Chief Officers of Environmental Health Scotland  
Suffolk County Council  
Suffolk Regional LA Food Safety Group  
The Co-operative Group  
The Ice Co  
The Livestock and Meat Commission for Northern Ireland  
Trafford Borough Council  
Tulip / Danish Crown  
UKHospitality  
Ulster Farmers Union  
UNISON  
Veterinary Public Health Association  
WD Meats  
Weddel Swift Distribution Ltd  
Welsh Food Advisory Committee  
Welsh Government  
Welsh Lamb & Beef Producers  
Wrexham County Borough Council

**Annex 4: Applicable regulations for Cutting Plants and Cold Stores**

Food Safety	Food Safety Act 1990
	The General Food Regulations 2004
	The Food Safety Act 1990 (Amendment) Regulations 2004
	Food Law – Code of Practice
Feed, food and hygiene	Regulation (EC) No 178/2002 laying down the general principles and requirements of food law (Consolidated version 30.06.2014)
	Regulation (EC) No 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (Consolidated version 01.03.2018)
	The Official Feed and Food Controls
	H1 – Regulation (EC) No 852/2004 on the hygiene of foodstuffs
	H2 – Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin
	Commission Regulation (EU) 2017/1981 amending Annex III to Regulation (EC) No 853/2004 of the European Parliament and of the Council as regards temperature conditions during transport of meat
	H3 – Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
	Commission Regulation (EU) No 219/2014 amending Annex I to Regulation (EC) No 854/2004 as regards the specific requirements for post-mortem inspection of domestic swine
	Commission Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs
	Commission Regulation (EU) No 217/2014 amending Regulation (EC) No 2073/2005 as regards Salmonella in pig carcasses
	Commission Regulation (EU) No 2074/2005 (Implementing Measures)
	Commission Implementing Regulation (EU) No 2015/1375 laying down specific rules on official controls for Trichinella in meat (Codification)
	The Food Safety and Hygiene Regulations
	Regulation (EC) No 2160/2003 on the control of salmonella and other specified food-borne zoonotic agents
	Commission Implementing Regulation (EU) No 931/2011 on the traceability requirements set by Regulation (EC) No 178/2002
	Regulation (EC) No 1333/2008 on food additives
	Commission Regulation (EU) No 231/2012 laying down specifications for food additives listed in Annexes II and III to Regulations (EC) No 1333/2008
	Commission Regulation (EU) No 380/2012 amending Annex II to Regulation (EC) No 1333/2008 as regards the conditions of use and the use levels for aluminium-containing food additives
	Commission Regulation (EU) No 101/2013 concerning the use of lactic acid to reduce microbiological surface contamination on bovine carcasses
	Regulation (EU) No 1169/2011 on the provision of food information to consumers, amending Regulations (EC) 1924/2006, (EC) 1925/2006 and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC, Commission Directive 2002/67/EC, 2008/5/EC and Commission Regulation (EC) No 608/2004
	The Food Information Regulations 2014

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

	Commission Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs
Animal by products	Regulation (EC) No 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption
	Commission Regulation (EU) No 142/2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council
Animals and related products	The Trade in Animals and Related Products Regulations 2011
	Commission Regulation EU No 37/2010 on pharmacologically active substances and their classification regarding maximum residue limits in foodstuffs of animal origin
	Regulation (EC) No 470/2009 laying down Community procedures for the establishment of residue limits of pharmacologically active substances in foodstuffs of animal origin
	The Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 2015
	Regulation (EC) No 726/2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Annex 5: Summary of comparative country analysis

Country	Approvals	Inspections / Audit	LA Operating Model	Competency	Industry assurance
<b>England</b>	<ul style="list-style-type: none"> <li>Mainly paper based application process managed by an Approvals Team</li> <li>No initial checks done to the FBO submitted application before allocating to the approvals officer</li> <li>Approval decision taken by Authorised Official in Operations Assurance Division</li> <li>Advisory visits are not chargeable</li> <li>Advisory visit completed by FSA FVLs</li> </ul>	<ul style="list-style-type: none"> <li>Full and partial audits conducted by a dedicated team of eVAs.</li> <li>VAs conduct enforcement activity on issues identified at audit of stand-alone premises.</li> <li>1 VA per visit for audit</li> <li>Audit visits take place in 1 day (generally)</li> <li>FVCs conduct 100% checks on UAI reports</li> <li>Extended Audit Frequencies (EAT) in place</li> <li>Staff conducting UAI visits: <ul style="list-style-type: none"> <li>RTE establishments SDP OVs or FVC</li> <li>non RTE establishments: FSA UAI MHIs or SDPs OVs</li> </ul> </li> <li>For UAI and audits information related to establishments is available in different IT platforms</li> </ul>	<ul style="list-style-type: none"> <li>Relevant businesses under LA remit are approved in accordance with the Food Law Code of Practice and associated guidance.</li> <li>Business under LA remit will be subject to official controls (including inspection) in accordance with the Food Law Code of Practice and associated guidance.</li> <li>Competency and qualification of officers is set down in, and will be assessed against, the Food Law Code of Practice and associated guidance.</li> </ul>	<ul style="list-style-type: none"> <li>Standards for contracted staff set out in formal agreements with service delivery partners</li> <li>Staff conducting approvals experienced and qualifications specified</li> <li>UAI OVs or MHIs</li> <li>Scope to improve competency assessment</li> </ul>	<ul style="list-style-type: none"> <li>A number of private standards are in place against which establishments may voluntarily be assessed/ audited</li> <li>Includes third party private assurance schemes such as BRC Global Standards (BRC GS), and Assured Food Standards (AFS) – operated by Red Tractor and, supplier specification standards.</li> <li>Association of Independent Meat Suppliers, Assured Meat Processing Scheme covers England and Wales only</li> </ul>
<b>Wales</b>	<ul style="list-style-type: none"> <li>As England but with approval decision taken by Authorised Official in Operations Assurance Division with discussions with the FSA Wales Director</li> </ul>	<ul style="list-style-type: none"> <li>As England</li> </ul>	<ul style="list-style-type: none"> <li>For approvals, same as England for businesses under LA remit</li> <li>For official controls, same as England for businesses under LA remit, with the addition that Remedial Action Notices (RANs) are an additional enforcement option in registered food businesses.</li> <li>For competency as England for LA officers</li> </ul>	<ul style="list-style-type: none"> <li>As England</li> </ul>	<ul style="list-style-type: none"> <li>As England</li> </ul>

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

Country	Approvals	Inspections / Audit	LA Operating Model	Competency	Industry assurance
<b>Scotland</b>	<ul style="list-style-type: none"> <li>Mainly paper based application process managed by an Approvals Team</li> <li>EO officer conducts initial checks on FBO applications after submission before they are passed to the approving veterinary officer.</li> <li>Approval decision taken by the FSS Director of operations</li> <li>Advisory visits are chargeable</li> </ul>	<ul style="list-style-type: none"> <li>Full audits conducted by FSS eVAs and partial audits conducted by SDPs</li> <li>Extended Audit Frequency (EAF) has not been implemented.</li> <li>1 VA per visit for audit</li> <li>Audit visits take place in 1 day (generally)</li> <li>VA do not carry out enforcement functions, this is always carried out by SDP</li> <li>For UASs FSS MHIs (5)</li> </ul>	<ul style="list-style-type: none"> <li>As Wales, with the additional requirements of the Scottish National Protocol for approved establishments.</li> </ul>	<ul style="list-style-type: none"> <li>Standards for contracted staff set out in formal agreements with service delivery partners</li> <li>Staff conducting approvals experienced and qualifications specified</li> <li>UAls OVs or MHIs</li> <li>Technical training programme for UAI staff</li> <li>Scope to improve competency assessment</li> </ul>	<ul style="list-style-type: none"> <li>As England with the addition that Quality Meats Scotland's Quality Scottish Assured Processor Standard covers Scotland only.</li> </ul>
<b>Northern Ireland</b>	<ul style="list-style-type: none"> <li>Mainly paper based application process managed by an Approvals Team</li> <li>No initial checks done to the FBO submitted application before allocating to the approvals officer</li> <li>Approval decision taken by the Head of Operational Policy and Delivery</li> <li>Advisory visits are not chargeable</li> <li>For slaughter cutting and GHE approvals (and co-located activities)</li> <li>Appraisals/advisory visits carried out by DAERA on behalf of FSA</li> <li>Joint approval visits by FSA (responsibility for approval) and DAERA (enforcement responsibility)</li> <li>Approval visit carried out by FSA Veterinarian</li> </ul>	<ul style="list-style-type: none"> <li>DAERA carry out inspection and verification activities (ante mortem and post mortem) in slaughter cutting and GHE on behalf of FSA under a Service Level Agreement</li> <li>DAERA also carry out FBO audits for FSA under the same Service Level Agreement</li> <li>2 VAs per visit for audit</li> <li>Audit visits take place in 2 days (generally)</li> <li>Hierarchy of enforcement same as England &amp; Wales</li> <li>Informal and formal enforcement carried out by DAERA, monitored by FSA; prosecutions carried out by FSA</li> <li>For UAS DAERA CP Compliance team conducts visits (3 MHIs + 1OV)</li> </ul>	<ul style="list-style-type: none"> <li>Official controls carried out in meat processing establishments (not co-located with slaughter cutting or GHE) by EHOs employed by District Councils across 11 District Council areas</li> <li>Enforcement carried out by EHOs as per FLCoP</li> </ul>	<ul style="list-style-type: none"> <li>DAERA provide a fully managed service under the Service Level Agreement</li> <li>All DAERA officials are employed as Civil Servants</li> <li>Under the terms of the Service Level Agreement DAERA are responsible for providing fully trained OVs and MHIs</li> <li>FSA authorise DAERA officials to carry out FSA tasks</li> </ul>	<ul style="list-style-type: none"> <li>As England</li> </ul>

### **Annex 6: User Design Workshop Feedback**

This report is a summary of the work produced from the workshops held as part of the review. Six User Design Workshops were attended by almost 100 organisation representatives from food businesses, LAs, trade bodies and other groups. The workshops adopted a user centred design approach – agreeing user profile and journeys, analysing current steps in achieving a goal and highlighting any pain points, followed by identifying potential solutions and actions to implement them

The workshop feedback can be found here:

<https://www.food.gov.uk/sites/default/files/media/document/fsa-fss-meat-cutting-plant-and-cold-store-review-workshop-feedback-october-2018.pdf>

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## Annex 7: Survey Responses

### FBO Survey

- Survey Monkey weblink was sent to 325 FBOs on the 17<sup>th</sup> July with a deadline completion of 27<sup>th</sup> July via:
  - FSA survey to 200 FBOs in England, Wales and Northern Ireland
  - FSS survey to 125 FBOs in Scotland
- The survey aimed to find out how meat cutting plants and cold stores interact with the FSA/FSS/DAERA and Local Authorities, and the value they get from these interactions. Questions were similar but not identical.
- Both surveys were in 2 parts, a survey for Cutting Plants and a survey for Cold Stores. FSA survey had 37 questions each with opportunities to use free text for comments. For the FSS survey, Cutting Plant Survey consisted of 19 questions and Cold Store survey had 32 questions with opportunities to use free text for comments in each.
- In term of response, 58 separate responses were received made up of:
  - For the FSA survey 13 respondents filled in the survey for Cutting Plants and 15 for Cold Stores
  - For the FSS survey 22 respondents filled in the survey for Cutting Plants and 8 for Cold Stores

Question area	Cutting Plants	Cold Stores
About the Business who responded	<ul style="list-style-type: none"> <li>• Employ wide range of staff – between 1 to 20 and over 500</li> <li>• 26% employ 1-20 staff and 150-500</li> </ul>	<ul style="list-style-type: none"> <li>• Employ wide range of staff – between 1 to 20 and over 500</li> <li>• 37% employ 1-20 staff with 21% 50-100 and 150-500</li> </ul>
Training	<ul style="list-style-type: none"> <li>• 73% provide basic HACCP training with 53% providing intermediate training and 20% advanced training.</li> <li>• On average 62% of staff are trained on HACCP</li> <li>• 97% provide GMP training in house</li> <li>• On average 93% of staff are trained on GMP</li> <li>• 79% provide other forms of training</li> </ul>	<ul style="list-style-type: none"> <li>• 72% provide basic HACCP training with 17% providing intermediate training and 33% advanced training.</li> <li>• On average 78% of staff are trained on HACCP</li> <li>• 75% provide GMP training in house</li> <li>• On average 79% of staff are trained on GMP</li> <li>• 27% provide other forms of training</li> </ul>
Contact with Regulator	<ul style="list-style-type: none"> <li>• In the FSA survey a third of respondents have contact every 6 months. The majority of respondents had an inspection in the last 2-3 months.</li> <li>• 97% thought the level of contact with the regulator was 'About right', with 3% responding with 'Too much'</li> <li>• In the FSS survey, 55% said they are visited by other Government Departments in food related matters</li> </ul>	<ul style="list-style-type: none"> <li>• In the FSA survey, nearly two thirds of respondents have contact yearly and a third have contact as and when required. Local Authority scheduled inspections were more infrequent over the last 1-2 years</li> <li>• Overall 86% thought the level of contact with the regulator was 'About right'. For the FSS survey 25% thought contact was 'too much'</li> <li>• For the FSS survey, 50% have regular visits with other Government departments.</li> </ul>

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Question area	Cutting Plants	Cold Stores
Achieving compliance with EU and national law relating to food	<ul style="list-style-type: none"> <li>• 93% would know who to contact if they had questions</li> <li>• In terms of the value of different types of regulator action the average response was not useful/effective 21%, partly useful/effective 42% and very useful/effective 36%.</li> <li>• 52% thought the increased number of official visits was not very useful</li> <li>• 61% thought the audit was very useful with 56% for Announced inspections</li> <li>• For the FSA survey respondents have been subjected to Audit Unannounced inspection, Education, coaching and advice and Announced inspection</li> <li>• Other support from the regulator in helping businesses comply with food law include consistency of advice/approach, more clarity and less ambiguity when giving guidelines, regular meetings with regulator, better communication, access to training/advice online, publishing details of best practice, for inspectors not to take a blanket approach, point of contact for help.</li> <li>• Areas of challenge respondents would like more information include inconsistencies particularly with Meat Hygiene Advisers on food law, labelling, micro and chemical analysis requirements, keeping up with the detailed paper work, staff cover when staff are away, crossover between FSA and FSS and 'Use by', 'Sell by' and 'Best by' clarity, tolerances and interpretation support, compulsory information on labels related to meat vacuum packed products ( related to primary production); traceability, beef labelling on further processed product.</li> </ul>	<ul style="list-style-type: none"> <li>• For the FSA survey 90% would know who to contact if they had questions. For the FSS survey respondents would contact EHO, local EHO office, google or FSS</li> <li>• In terms of the value of different types of regulator action the average response was not useful 33%, partly useful 35% and very useful 32%</li> <li>• 62% thought court penalties was not very useful, with over 50% thinking the same for Increased number of official visits, withdrawal of approval/registration and CCTV</li> <li>• 69% thought education, coaching and advice was very useful</li> <li>• For the FSA survey, respondents have been subjected to Audit, Unannounced inspection and Announced inspection</li> <li>• Other support from regulator in complying with food law, key themes were Coaching and guidance</li> <li>• In the FSS survey 75% of respondents did not identify any challenges with complying with Food Law in relation to multiple regulators although 25% felt misled by EHO on sampling, temp, and vac-pac controls</li> <li>• Areas of challenge respondents would like more information on include FSA guidance should be distributed to approved premises as a matter of course, particularly when updates are issued. Too much rests with the FBO who is expected to find all information out themselves. Guidance documents should also include easier to read/interpret summaries as the main documents are too technical and not user friendly.</li> </ul>
Key factors when setting product durability dates	<p>In the FSS survey, the key factors businesses use when establishing durability dates for products include:</p> <ul style="list-style-type: none"> <li>• Predictive modelling and food safety</li> <li>• Product is not specifically processed for durability testing, we select at random from that day's production so that test result is an indicator of our everyday processing</li> <li>• MDD for stock. Organoleptic assessment over life together with microbiological testing against</li> <li>• Specified targets and limits for outputs</li> <li>• Stay well within FSS guidelines. Used by dates on products used. Product shelf life testing. Experience and historical data</li> <li>• Micro testing with a lab for shelf life. Micro limits, industry standard practices</li> <li>• Microbiological limits Organoleptic testing Historical evidence Industry Best Practice</li> <li>• Industry standards and guidelines and product testing</li> <li>• Temperature control throughout process. Efficiency / speed of process. Care in handling / robust packaging</li> </ul>	



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Question area	Cutting Plants	Cold Stores
	<ul style="list-style-type: none"> <li>• Organoleptic tests, micro tests, challenging test carried out by Campden if required,</li> <li>• Microbiological testing, use by dates declared on produce, shelf life testing, temperature control</li> <li>• Experience of business. Testing experience, historical data knowledge</li> <li>• Product, storage, packaging, testing independent company Shelf life data and testing, chilling regimes, temperature control points, prehistoric data</li> <li>• Safe product shelf life protocol, which covers micro, biological &amp; organoleptic factors</li> </ul>	
Other considerations in relation to intake of raw materials from suppliers when setting durability dates	<p>In the FSS survey, the considerations businesses take into account in relation to the intake of raw materials from suppliers and how this can impact on product shelf life:</p> <ul style="list-style-type: none"> <li>• Temperature checking and micro swabbing.</li> <li>• Schedule raw materials intake to suit sales needs. Carcase hygiene good working practice</li> <li>• MDD, Temperature, Storage Conditions, Packaging</li> <li>• Procedure which ensures that shelf life is checked at all stages of production.</li> <li>• Condition of product Temperature Source.</li> <li>• In-house scheme of approved suppliers.</li> <li>• Time since Kill Date Storage since Kill Date Transportation to site Visual inspection by 30+ year experienced Intake Manager Comparison against agreed specification.</li> <li>• Life, Boxed products are ordered on as needed basis so minimising the shelf life requirement, Box contents are checked for use by dates on delivery.</li> <li>• Correct temp. at delivery, supplier accreditations, reputation and previous audit results.</li> <li>• Only EU Licensed suppliers. Confidence built up over long term association. Quality of product and service.</li> <li>• Integrity of packaging, temperature, transport condition, product handling.</li> <li>• Integrity of product, vacuum seal intact, temperature of product, no foreign body contamination,</li> <li>• Correct labelling advice to include use by date, if carcass meat - how it has been stored (risk of foreign body contamination).</li> <li>• Cold chain standard of supplier</li> <li>• Approve supplier list brand integrity product temperature product specification.</li> </ul>	
Official Guidance and support	<ul style="list-style-type: none"> <li>• From the FSA survey 67% have used FSA guidance, main sources of guidance are FSA Meat Industry guide and relevant food guides</li> <li>• From the FSA survey on usefulness 57% found the guides moderately easy, 29% very/extremely useful and 14% not at all easy. On accessibility 57% found the guides very/extremely easy, 29% moderately easy</li> <li>• Guidance could be improved by simplify/shorten and provide worked examples.</li> <li>• 33% said other areas would benefit from additional guidance - Meat Labelling, general approach from FSA as regulator</li> </ul>	<ul style="list-style-type: none"> <li>• 69% have not used guidance provided by LAs. 31% have used guidance, the main sources being regular email bulletins</li> <li>• Of those that have used guidance 100% found it extremely/very useful.</li> <li>• 75% found the guides extremely/very easy. Guidance could be improved by email updates provided by all LA's.</li> <li>• Only 25% said other areas would benefit from additional guidance, including Email updates adopted by all LA's</li> </ul>
Value from interactions	<ul style="list-style-type: none"> <li>• 54% thought inspections, visits, advice received from regulator was either extremely or very valuable. A further 29% thought it was moderately valuable</li> <li>• In the FSA survey comments to explain the rating included, some valuable guidance is sometimes given in relation to export requirements but far too often the clauses are open to interpretation</li> </ul>	<ul style="list-style-type: none"> <li>• 43% thought inspections, visits, advice received from regulator was either extremely or very valuable. A further 43% thought it was moderately valuable</li> </ul>

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Question area	Cutting Plants	Cold Stores
Private assurance standards	<ul style="list-style-type: none"> <li>71% of respondents are members of a private assurance scheme</li> <li>From the FSA survey 75% are measured against BRC Global Standards (BRC GS)</li> <li>From the FSA survey 57% thought that incorporating outcomes from these audits with the Food Compliance regulatory visits would be beneficial</li> <li>66% would be willing to share information from these third party audits with the regulator. The main reason why not is that information is shared already</li> </ul>	<ul style="list-style-type: none"> <li>85% of respondents are members of a private assurance scheme. The majority are measured against BRC Global Standards (BRC GS)</li> <li>In the FSA survey 78% thought that incorporating outcomes from these audits with the Food Compliance regulatory visits would be beneficial</li> <li>83% would be willing to share information from these third party audits. The main reasons why not is that information is already published and concern how the information would be used.</li> </ul>
Challenges faced by businesses in food regulation	<ul style="list-style-type: none"> <li>In the FSA Survey challenges where food law compliance responsibility is shared between different food regulators include different approaches requirements and priorities, and inconsistencies/interpretation can vary. 83% have not transferred regulator from LA to FSA/FSS/DAERA or vice a versa</li> </ul>	<ul style="list-style-type: none"> <li>In the FSA survey challenges where food law compliance responsibility is shared between different food regulators include consistency and interpretation. An example provided is of a FBO reliant on trade membership of BFFF to summarise food law guidance and legal issues</li> <li>79% have not transferred regulator LA to FSA/FSS/DAERA or vice versa</li> </ul>
Understanding of the roles in assuring food law compliance	<ul style="list-style-type: none"> <li>In the FSA survey, 71% have a full understanding of the role of the FSA/FSS/DAERA in relation to the regulation of food law compliance. Only 29% have a full understanding of the LA role – 42% have limited or no understanding. 100% are aware of the requirement to notify the food regulator of any significant changes to the business. 86% of respondents know who to contact</li> <li>In the FSS survey, the National Protocol Q&amp;A determines whether the establishment needs to register with FSS or LA. They are either one or the other (except in Food Standards matters)and FBOs are clear on respective roles in each case.</li> </ul>	<ul style="list-style-type: none"> <li>64% have a full understanding of the role of the LA in relation to the regulation of food law compliance.</li> <li>50% have a full understanding of the FSA/FSS/DAERA role – 50% have some understanding</li> <li>100% are aware of the requirement to notify the food regulator of any significant changes to the business.</li> <li>92% of respondents know who to contact</li> </ul>
Other suggestions for improvement	<ul style="list-style-type: none"> <li>Consistency, particularly in relation to MHI unannounced visits</li> </ul>	<ul style="list-style-type: none"> <li>More updates via email on new regulation. Clearer communication from FSA on updated &amp; current legislation including practical guidance</li> </ul>

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### LA response to the second stage survey questions

- An initial survey was issued in May 2018 to a targeted number of LAs in England (29 based on involvement in recent incidents) and all LAs in the devolved countries.
- This in turn informed a follow up/second stage survey which was sent to all LAs to sense-check the initial feedback to confirm whether it gave a representative summary. The second stage survey was also used as an opportunity to ask a number of questions to get views on potential areas where there might be scope for improvement and/or an alternative approach
- 52 responses were received

Question	Response
Should the Food Law Code of Practice risk assessment scheme be reviewed to ensure cutting plants and cold stores are inspected at the appropriate frequency?	<p>77% either strongly agree or agree. Comments included</p> <ul style="list-style-type: none"> <li>• Premises handling raw meat should be considered as high-risk. Cold stores are inherently lower risk but perhaps an addition scoring weighting could be added for complex logistical operations or for approved premises in general</li> <li>• I feel that cold stores and cutting plants under my control at LA level are inspected at the correct frequency already and this does not need to be increased.</li> <li>• I think that the Agency should have been more active in ensuring that rather than just promoting a prioritised approach to interventions it could have been more active in identifying local authorities not carrying out a full intervention programme and making sure that they maintain the resources to be able to</li> <li>• A more appropriate and relevant scoring system for these usually low risk premises is important to reduce/prevent food fraud and its implications for the food industry and safeguarding public health.</li> <li>• For a stand-alone cold store, simply storing frozen or fresh products for independent customers the existing risk rating is fine as it brings the premises out as a D or an E which is where it should be. This rating is however inconsistent with the need to have a stand-alone cold store with no other activities approved as the process is disproportionate to the risk.</li> <li>• It is also very dependent on that activity taking place at the cold store but this would be taken into account and the Approval should reflect this.</li> <li>• The food standards scheme needs review, but not specifically for cutting plants or cold stores. The hygiene risk assessment scheme works fine to assess the risks</li> <li>• Cutting plants and cold stores require a more nuanced scheme</li> <li>• There appears to be greater potential for food fraud from such premises and this should be included in the assessment</li> </ul>
Would a single guidance document on controls in cutting plants (for LA and FSA officials), including clarification on the split of roles and responsibilities, support greater consistency?	<p>96% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• The complicity in food networks and involvement of more than one enforcement body has added to the regulator(s) not fully understanding the supply and food waste networks potentially leaving some operations exposed. The potential for closer working such as joint visits, mapping operations and sharing data should be considered</li> <li>• There is a definite need for clarity around how the division of responsibility.</li> <li>• Would be useful as can be a grey area.</li> <li>• The comprehensive guidance for approved premises is very useful and similar approach to cutting plants/cold stores using checklists and aide-memoirs would greatly improve consistency of approach and decision making.</li> <li>• Also could include a system for peer review between the different Agencies as well as training</li> <li>• I feel this would be very helpful</li> </ul>
Would you welcome training for LA officers on delivery of controls in cutting plants and cold stores?	<p>94% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• Face to face training is required as well as online training modules.</li> <li>• Officers should already know how to inspect these premises, although any training is always valued</li> <li>• This is needed as it would enable officers to have greater clarity on the areas that should be focused on, and hence improve consistency across the country. Enforcement awareness could be highlighted.</li> <li>• All training is useful but would certainly focus the mind given the recent incidents.</li> </ul>

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Question	Response
	<ul style="list-style-type: none"> <li>• It would very useful if under checked issues such as receiving, storing and distributing imported foods could be included.</li> <li>• Definitely, we are coming across more and more establishments which are falling inside the definition of cold store</li> <li>• All training is helpful to improve the knowledge base and consistency of enforcement.</li> <li>• An area we do not get involved in that often and therefore training would be invaluable to ensure consistent approach.</li> <li>• All training welcome - some practical element would be useful</li> <li>• Training helps achieve consistency and professionalism when dealing with industry</li> </ul>
<p>Would you welcome standardized inspection forms for cutting plants and cold stores?</p>	<p>86% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• This would improve consistency across the enforcement agencies.</li> <li>• It would assist in improving consistency, as we have encountered situations where other LAs have agreed to Works very well for approved premises.</li> <li>• Useful to have model inspection forms/aide memoires but use should not be compulsory</li> <li>• These have been very helpful in the sectors they have already been developed for and would assist officers.</li> </ul>
<p>Would you welcome a more formal process to support effective and timely communication and exchanging of information between authorities with a shared role in delivering official controls?</p>	<p>77% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• Operations need to be mapped and data shared across enforcement agencies, as appropriate.</li> <li>• Generally, communication and intelligence is good but would be useful to formalise processes and requirements.</li> <li>• More formal communication process would aid exchange of information.</li> <li>• Including communication for FS and FH colleagues, as well as FSA, particularly covering enforcement of traceability.</li> <li>• Improved communication can only be a good thing</li> </ul>
<p>Would you welcome a more joined up approach to inspection activity between LAs and LAs and the FSA, including the potential for joint visits?</p>	<p>78% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• I accompanied an FSA auditor to a plant (FSA enforced). Both found the experience worthwhile and found faults that were fed back into the report</li> <li>• In certain circumstances this could have a benefit, particularly in determining whose responsibility a particular premise might be.</li> <li>• This would be a good idea from time to time. More can always be learned.</li> <li>• We have found this very useful but recognise that it does not seem common</li> <li>• FSA responsibilities should remain the same, however having the flexibility to call on competent, trained LA officers to aid investigation/incidents would be a benefit.</li> <li>• Improves clarity of process, prevents duplication of effort from different agencies and operator, prevents operators giving inaccurate feedback to agencies and ultimately should improve consistency of enforcement and better identification and control of risk.</li> <li>• Whilst I would support a more joined up approach I don't believe that joint visits would achieve this. Clearer guidance and a more streamlined inspection process with a focussed, more targeted approach would do more to achieve this.</li> <li>• Business would prefer joint visits.</li> <li>• At least all parties are getting the same information at the same time so agreement can be reached on the outcome.</li> <li>• Agree, for all cutting plants, for food standards and for food hygiene in premises which may be nearing the size where FSA approval would be required.</li> <li>• In cutting plants the sharing of skills and knowledge would be of great benefit between the FSA and LA.</li> <li>• On the few occasions I have carried out joint visits I have found them very useful to understand each others point of view or interpretation of guidance</li> </ul>

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Question	Response
<p>Would you welcome a review of the current policy around the two tonne threshold, to address the challenges this presents in terms of shared enforcement responsibility?</p>	<p>82% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• An arbitrary figure is often difficult to determine, so yes clarity around this would be beneficial.</li> <li>• This would be welcomed.</li> <li>• It has been challenging for the larger catering butchers in our District that trade on the threshold of requiring Approval to accurately record and demonstrate that they trade below the 2 tonne requirement.</li> <li>• Significant challenge in terms of shared enforcement. Also for fluctuating thresholds gets very messy.</li> <li>• Better for business to have one enforcing authority. Better for LA to have authority in catering butchers, smaller cutting plant type premises.</li> <li>• The most difficult challenge is evidencing the 2 tonne threshold in practice, but I'm not sure what the alternative is.</li> <li>• Localised and marginal exemption criteria should also be reviewed</li> <li>• The wording of some approval regimes makes for extremely confusing reading, which can ultimately lead to mistakes as to whether a business requires approval and in some scenarios even whether approval is given by the LA or FSA.</li> <li>• There should be a discussion about flexibilities generally</li> <li>• This is often a challenge for LAs</li> <li>• This is a particular problem in our area - we seem to have a large proportion of catering butchers and cold stores. The 2 tonne exemption we believe is open to abuse and it can be difficult to establish when exceeded.</li> </ul>
<p>Would you welcome a review of the split of responsibilities between LAs and the FSA to minimize the need for dual enforcement?</p>	<p>72% either strongly agree or agree. Comments included</p> <ul style="list-style-type: none"> <li>• Remove dual enforcement and have one regulator dealing with all activities</li> <li>• Yes this again would be very beneficial.</li> <li>• Clarity of roles is important. Although there will be premises where dual enforcement is most appropriate i.e. slaughterhouses with a retail butchery attached.</li> <li>• Would improve consistency of enforcement, reduce duplication of effort and should manage risks more effectively.</li> <li>• A specialist enforcement team may be more successful in achieving this goal.</li> <li>• In the scenario of the catering butcher who does RTE foods, it is better to have split responsibilities</li> <li>• Better communication, a review of enforcement powers and guidance will resolve issues.</li> <li>• This could be improved by better working together as detailed above.</li> <li>• The exemption criteria is complex and often FBOs do not provide sufficient information &amp; in some cases try to avoid being regulated by the Agency</li> <li>• I see some merits to this but feel resources would be difficult to match to the number and variety of premises</li> <li>• This should be based on the main use of the premises. e.g. a meat products plant selling a small proportion of raw meat should remain with LA rather than as now transferring to the FSA.</li> </ul>
<p>Would you welcome further controls/guidance on traceability of beef and other meats when sold loose?</p>	<p>81% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• This just needs to be better enforced at butcher shop level.</li> <li>• Yes, but will be difficult to enforce.</li> <li>• Guidance available in NI - Beef labelling guidance document and LAs have received training from DAERA</li> <li>• Important that further guidance does not duplicate existing guidance but consolidates all guidance in a single place. Guidance to be updated in a timely way, as legislation changes.</li> <li>• Agree to a certain extent, except where the exemption exists for local, marginal, etc. exists</li> </ul>
<p>Would you welcome joint LA/FSA training/guidance to promote consistency of</p>	<p>96% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• Training is always beneficial.</li> <li>• We have received training from FSA with reps from DAERA</li> <li>• Avoid inconsistency and give inspectors a better understanding on how to apply regulations</li> </ul>

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Question	Response
interpretation of the requirements?	
Would you welcome greater sharing of intelligence between LAs and the FSA to inform targeted inspection and sampling?	<p>96% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• Food operations are complex and cross regulators, operations need to be mapped and shared across enforcement agencies accordingly</li> <li>• Inspections should be intelligence led</li> <li>• Sharing of information between the two bodies on areas to focus in on / areas of concern would be very useful.</li> <li>• Although RASFF notifications provide some help and focus. It would be useful to have greater access to findings elsewhere - perhaps by great use of FSA's Smarter Comms.</li> <li>• It is essential to have the right intelligence to target inspection and sampling effectively and this needs to be across all agencies.</li> <li>• Food standards and food fraud groups with reps from FSA in place in NI to share intelligence and co-ordinate sampling programmes for LAs</li> <li>• Most definitely. It would be to the benefit of food business and the regulators to get into businesses much earlier to prevent problems escalating.</li> <li>• Sharing of information is a good thing</li> </ul>
Should Cold Stores be exempt from approval?	<p>53% either strongly agree or agree. 23% neither agree or disagree. Comments included:</p> <ul style="list-style-type: none"> <li>• There would need to be some control over the cold stores that carry out re-wrapping as there could be issues with the durability dates, traceability,</li> <li>• Cold stores that store food chilled or frozen and only distribute with no other activity involved should be removed from approval.</li> <li>• If RANS were available for use within all businesses then approval wouldn't even be necessary as all elements of the legislation already apply to cold stores. Most cold stores do not re-wrap so don't need to apply an approval number to their products, so the number isn't used other than on invoices for example. Meat Products Establishments have to receive meat from an approved establishment which does not help the economy as small butchers are able to provide the same quality of meat with traceability. In particular this is an issue to the smaller artisan style meat products manufacturers who have to source meats from a larger approved establishment so this does need review.</li> <li>• The smaller Cold Stores should be exempt but not the larger ones.</li> <li>• If no re-wrapping takes place it seems pointless to approve the establishment. If you would like these inspected more frequently amend the food establishment intervention rating scheme accordingly.</li> <li>• Approval is a useful tool in achieving and maintaining a minimum standard. It is quite bureaucratic but it does give those in the industry some idea that the relevant authority is at least aware of the establishment</li> <li>• Review of approval process for cold stores, needing to take into account nature, size and distribution of the business. Similar to current exemptions, of localised, marginalised etc</li> <li>• Approval does not result in more frequent inspection and there are relatively few 853/2004 requirements relating to cold stores. Controls in 178/2002 and 852/2004 adequately cover most food hygiene issues in cold stores.</li> <li>• The one problem that does exist is that cold stores are not the owners of the food being stored and they do not break down and inspect pallets. This would not be possible or practical. We have to accept that the responsibility for ensuring that the food is fit lies with the owner of the food. I don't think that being approved or not would make any difference to this.</li> <li>• Small cold stores should not require approval if all they do is hold goods for third parties</li> <li>• I believe cold stores handling raw meat should be approved</li> <li>• They are an integral part of the supply chain</li> <li>• Although low risk in traditional sense, any traceability, mislabelling, authenticity issues could have widespread consequences.</li> </ul>

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

Question	Response
Should there be more/better guidance and training for industry?	<p>92% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• The provision of some sector specific training would definitely assist businesses in achieving compliance.</li> <li>• Greater awareness of particular requirements for imported foods especially as first point of delivery.</li> <li>• In my experience if companies have an understandable "do-able" standard to meet then it is much easier to achieve compliance</li> <li>• Delivery and funding is an issue</li> <li>• But there is still the need for oversight by regulatory authorities. Just because everyone is trained does not mean that issues and bad practice are less likely.</li> <li>• Guidance available in NI for food standards in butchers/catering butchers. Small businesses suitable only for one-one training as given by EHO's on inspection, 'industry' training not always suitable for them</li> <li>• Better guidance rather than just "more". Needed for small catering butchers.</li> <li>• Cutting plant operators need issuing with clear guidance or instruction in some simple and fundamental areas.</li> </ul>
Are the existing options for enforcement powers considered sufficient?	<p>78% either strongly agree or agree. Comments included:</p> <ul style="list-style-type: none"> <li>• RANs would be useful in non-approved premises.</li> <li>• Full suite of powers area available. There has not been a need to use them.</li> <li>• RANs for all businesses whether approved or not. Notices/Fines for lack of traceability, rather than having to go straight for prosecution under article 18. Or the ability to serve a section 29 notice to seize food that has no traceability information as required under Article 18 of 178/2002 We currently we can't use Reg 29 Food Safety Hygiene England 2013 Notices for not complying with 178/2002 only the hygiene regulations so our only option for dealing with foods with no traceability is to prosecute there is nothing to deal with the actual problem of removing the goods unless we deem them to be unfit, not great is you suspect the food has dubious source but you can't prove unfitness. without a forensic accountant can be difficult to prove invoices and receipts are or aren't linked to the food found especially where no labelling exists.</li> <li>• Although it would be useful to be able to use RANs in all food premises</li> <li>• Civil penalties</li> <li>• Agree for food hygiene but from a food standards /traceability point of view, some EC requirements have no offences attached to them. Powers of seizure and detention need to be extended for traceability issues.</li> <li>• All or nothing application. There should be a middle ground for issues that are not food safety issues, but labelling issues that could be resolved without the need for destruction/seizure - determined on a case by case basis and CIM.</li> </ul>

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

### Annex 8: Summary of lessons learned analysis from previous incidents

Review	Recommendation	
Pat Troop- Review of FSA response to the incident of contamination of beef products with horse and pork meat and DNA- June 2013- Recommendations	1	The need for improved intelligence across the food industry
	2	The need for the FSA to strengthen its major incident plan
	3	Improved clarity of the role of Government departments in large, complex incidents
	4	Review of the FSA's powers and the use of framework agreements with local authorities and codes of conduct with the food industry

Review	Recommendation	
Elliott Review into the Integrity and Assurance of Food Supply Networks – A National Food Crime Prevention Framework -July 2014	Consumer first	Prevention of contamination, increased awareness of food fraud and annual targeted surveillance programme
	Zero tolerance	Industry to include managing food fraud as a risk on risk registers, conducting sampling and testing, and taking up food crime education opportunities
	Better intelligence gathering	Collection, analysis, distribution of information and intelligence between regulators and industry
	Provision of Laboratory Services	To support audit, inspection and audit activities
	Strengthen Audit	Development of a modular approach include food safety and integrity requirements into standards frameworks (including for traders and brokers) and carry out less frequent but more effective audits (including anti-fraud measures as part of audit).



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Review	Recommendation	
	Government support	More strategic and coordinated approach to food law enforcement delivery, including R&D, policy development and operational delivery. Senior oversight and assurance through a National Food Safety and Food Crime Committee
	Leadership	More coordination of effective investigations and prosecutions of food fraud and food crime through creation of Food Crime Unit
	Crisis Management	Incident management clarity of roles and responsibilities and acceptance of Troop recommendations

Review	Recommendation	
EFRA Select Committee Report – Recommendations Summary	1	All accreditation firms, ....., will .... tighten their processes and remove some of the more obvious loopholes.
	2	Confidentiality issues which apparently prevent the systematic sharing of data and intelligence .... be worked around so that a single unified record of standards and hygiene practices can be kept to better identify failings
	3	The Food Standards Agency’s investigation into the case must examine the quality of its risk assessment to take better account both of its management’s history and the facility’s role in the food chain and the number of farmers and suppliers who rely on it
	4	Defra both launch a consultation on extending [cctv]to cutting plants and produce an impact assessment of the likely costs and benefits to the industry of introducing such measures
	5	We recommend that Defra and the Food Standards Agency confirm to us in response to this Report that .....required funds have been released [to expand the role of NFCU to give it investigatory powers].
	6	We request that Mr Boparan continues to update us on his progress in both installing these new measures and on re-establishing his supplier relationship with the main retailers

## REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

	7	We recommend that the Food Standards Agency provide us with a written assurance that each reform promised to us by the accreditation agencies, 2 Sisters Food Group and the FSA itself has been made, no later than six months from publication of this report
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Review	Recommendation	
Enhancing FSA Operations Group response to incident handling April 2018	Incident Preparedness	<ul style="list-style-type: none"> <li>Plans/ procedures (MOC and IMP) are not aligned – two isolated systems</li> <li>Lack of awareness of each others plans and procedures</li> <li>Staff not trained to respond to incidents - Joint response not exercised</li> <li>Have we learnt from the previous incidents/crises</li> </ul>
	Detection of incident	<ul style="list-style-type: none"> <li>Incident definition</li> <li>Unclear routes of reporting of incidents and what needs to be reported</li> <li>Classification of incident – level of urgency/priority not clearly understood</li> <li>Contacts lists – not easily accessible and understood</li> </ul>
	Management of the incident	<ul style="list-style-type: none"> <li>Lack of understanding respective roles/responsibilities/decision making process</li> <li>Lack of understanding each other's priorities/pressures</li> <li>Unclear 'command and control' between Ops Assurance, Field Ops, I&amp;R Unit and NFCU – and externally with LAs</li> <li>Unclear handover procedures</li> </ul>
	Control Measures	<ul style="list-style-type: none"> <li>More holistic approach to enforcement needed i.e. focused on food safety in addition to food hygiene – to drive better FBO compliance (e.g. traceability)</li> <li>Better alignment in enforcement approach between FSA and LAs for consistency – including undertaking enforcement action (i.e. serving HEPN/HEPO, joint inspections)</li> <li>Insufficient evidence gathering and verification - failure to achieve prosecution / detect potential food safety and non-compliance issues</li> </ul>
	Communication	<ul style="list-style-type: none"> <li>Better incident reporting and internal communication during incident via joint sit reps, brief meeting notes and clear actions (prioritisation)</li> <li>Clear communication lines</li> <li>Improvement of quality of feedback/reporting during incident investigations – verbal and written</li> </ul>

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Review	Recommendation	
	Other	<ul style="list-style-type: none"> <li>• Inadequate IT/ mobile equipment</li> <li>• Lab contracts</li> <li>• Financial procedures to capture costs of response</li> </ul>
	Resourcing /Training	<ul style="list-style-type: none"> <li>• Better understanding of priorities and resource allocations – ‘in peace and in war’ from resilience point of view</li> <li>• Lack of training on incident handling, understanding microbiological criteria, evidence gathering, foodborne outbreak investigations</li> </ul>

# REVIEW OF MEAT CUTTING PLANTS AND COLD STORES

## Annex 9: Options Appraisal Framework

The review team developed an appraisal framework for evaluating recommendations, as shown below. This framework included reductions in the risk to public health as one of the key evaluation criteria. This framework was quality assured by the independent Challenge Group before being used to evaluate recommendations.

Recommendations were scored and evaluated to inform the final list of recommendations in the report. Recommendations were scored from 1-5 for each criterion, with a score of 5 indicating criteria had been fully met and a score of 1 indicating criteria had not been met.

Evaluation was undertaken in 2 stages – an initial internal assessment by the review team followed by an assessment by a panel of senior leaders from across FSA/FSS (including both SROs). Following the appraisal exercise, the review team identified 20 recommendations.

Evaluation criteria		
Criteria	Description	Weighting
<b>1. Desirability: Will it help us to achieve our objectives?</b>		
Assurance	Strengthens delivery of Official Controls	25%
	Strengthen consumer confidence in meat production	
	Improves public and stakeholder confidence in the regulatory and assurance framework	
Food Safety Risk	Solution targets where there is risk in food safety	25%
	Minimises / reduces risk to food safety	
Sustainability	Supports future sector needs and changes	10%
	Alignment with ROF / FSS Regulatory Strategy Programmes	
<b>2. Feasibility: Can this be done?</b>		
Cost / value for money	Solution is affordable to implement for FSA/FSS/DAERA/LAs and offers good VFM	10%
	Solution is affordable to industry and good VFM	
Simplicity	Relatively straightforward to implement	10%
<b>3. Achievability: How likely are we to succeed and when?</b>		
Likelihood of success / pace of delivery	High likelihood of success and can deliver benefits quickly	10%
	Good chance of success but will deliver benefits over longer timeframes	
	Minimises the disruption to ongoing services	
Stakeholder support	Has the support/buy-in of key stakeholders	10%

## Annex 10: Glossary

FSA	Food Standards Agency
FSA NI	Food Standards Agency Northern Ireland
FSS	Food Standards Scotland
DAERA	Department of Agriculture, Environment and Rural Affairs (part of Northern Ireland Executive)
LA	Local Authorities
FBO	Food Business Operators
SROs	Senior Responsible Owners
HACCP	Hazard Analysis and Critical Control Points
GMP	Good Manufacturing Practices
GHP	Good Hygiene Practices
BRC	British Retail Consortium
BRC GS	BRC Global Standards
CFA	Chilled Food Association
AFS	Assured Food Standards
MSM	Mechanically Separated Meat
MIG	Meat Industry Guide
MOC	Manual for Official Controls
SALSA	Safe and Local Supplier Approval
EFRA	Environment, Food and Rural Affairs Select Committee
PGI	Protected Geographical Indications
PDO	Protected Designation of Origin
2SFG	2 Sisters Food Group – Poultry
BPC	British Poultry Council
CCA	Central Competent Authorities
UAI	Unannounced Inspections
OV	Official Veterinarians
MHI	Meat Hygiene Inspectors
FSMS	Food Safety Management Systems
VA	Veterinary Auditors
AVL	Audit Veterinary Leaders
OCV	Official Control Verification
SDP	Service Delivery Partner

MRCVS	Member of the Royal College of Veterinary Surgeons
ROF	Regulating Our Future Programme
PIR	Post-Implementation Review
IPA	Cabinet Office Infrastructure and Projects Authority



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