

**FINAL REPORT**

**EVALUATION OF BUTCHERS' SHOP LICENSING  
INITIATIVE IN SCOTLAND**

**PREPARED FOR  
THE FOOD STANDARDS AGENCY SCOTLAND**

**(Project Code S01011)**

**By**

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### **Abbreviations used in the report;**

<b>EU</b>	European Union
<b>FEO</b>	Food Enforcement Officer
<b>FSA</b>	Food Standards Agency
<b>FSAS</b>	Food Standards Agency Scotland
<b>HACCP</b>	Hazard Analysis Critical Control Point
<b>LA</b>	Local Authority
<b>LACOTS</b>	Local Authority Co-ordinating body in Trading Standards (Now Local Authorities Coordinators of Regulatory Services (LACORS))
<b>REHIS</b>	Royal Environmental Health Institute of Scotland
<b>RSH</b>	Royal Society of Health
<b>SFCC</b>	Scottish Food Co-ordinating Committee (now Scottish Food Enforcement Liaison Committee (SFELC))
<b>SME</b>	Small to medium enterprise

# 1. SUMMARY

The objective of this study was to carry out an evaluation of the impact of the Butchers' Shop Licensing Regulations in Scotland, which required butchers selling both raw and cooked meat to obtain a licence from their relevant Local Authority (LA) to grant approval to trade. The aim was to learn lessons relating to the practical application of Hazard Analysis and Critical Control Point (HACCP) Principles in small food businesses. The programme consisted of:

- A detailed investigation, by questionnaire, telephone interview and personal interview, in which the relevant officials in all 32 LAs in Scotland were visited to find out views on the licensing of butchers and the way in which it was implemented.
- Visits to 198 butchers' shops in all LA areas of Scotland to obtain the views of the butchers and to assess their food safety management systems.
- A consumer confidence study in which a sample of 1,893 meat consumers in Scotland participated.

## Local Authority Study

The main findings were that Food Enforcement Officers (FEOs) felt that:

- Food safety standards had improved in butchers' shops since the *E. Coli* O157 outbreak in central Scotland.
- These food safety improvements may not be attributed solely to licensing, as LAs in Scotland had taken action to improve food safety standards in the immediate aftermath of the *E.coli* O157 outbreak and before the Butchers' shop Licensing Regulations were introduced in Scotland in October 2000. These improvements were made possible by the provision of additional government funds to Scottish LAs specifically directed to support the Pennington Expert Group recommendations, with improved hygiene for high risk premises the main focus.
- LAs in Scotland felt that they faced a considerable challenge in introducing the Butchers' shop Licensing Legislation because the time-scale for implementation of the legislation was tight. Furthermore, the initial guidance from FSA Scotland was not issued until May 2000 with the date for implementation of the Butchers' shop Licensing Regulations across Scotland on 2<sup>nd</sup> October 2000.
- The survey of LAs identified a lack of consistency between the implementation of the licensing legislation across Scotland.

## Survey of butchers and assessment of management systems

In this part of the study 150 independent butchers and 48 supermarkets were visited. The main findings were that:

- The standards of food safety were rated as excellent, fully acceptable or acceptable in 98% of supermarkets and 86% of independents.
- 49% of the supermarkets and 76% of the independents believe that food safety within shops has improved as a result of the licensing initiative. The remainder considered that they already had very high food safety standards as steps had been taken to improve food safety within their premises immediately after the *E.coli* O157 outbreak.
- The training requirement specified in the legislation did not provide all the information needed to prepare for licensing.
- FSA Scotland sent butchers the guidance document on the Butchers' Shop Licensing Legislation in May 2000. However, this guidance document did not give guidance for butchers that explained what the requirements were and how they were to be implemented as the guidance stated that "individual businesses must decide in consultation with their LAs, the most appropriate way forward for them." Therefore, the independents had to rely on the FEOs for advice on what would be required under the licensing legislation to be awarded a licence.
- From the butchers' perspective there was a lack of consistency between the LAs in the requirements expected in order to be granted a licence.
- 47% of the independents encountered difficulties in preparing for licensing, but only 16% of the supermarkets did.
- The support provided by the FEOs to butchers was rated as highly satisfactory or satisfactory by 92% of the respondents.
- In 75% of the independent butchers' premises, the HACCP/Separation systems were rated excellent (14%), fully acceptable (37%) or acceptable (24%) by the assessors used in this study.
- In 78% of the independent butchers' premises, the documentation and implementation were rated as excellent (17%), fully acceptable (35%) or acceptable (26%) by the assessors used in this study.
- Many of the food safety systems were rated simple but effective, while others were rated as cumbersome and the documentation excessive by the assessors used in this study.
- There were major differences between the independent butcher's premises and the multiples (supermarkets). Multiples operate across

the country, have considerable technical resources available and devise company-wide systems and procedures, which are applied to all stores. These differences between multiples and independent butchers' premises may need to be taken into consideration when formulating future legislation.

## **Consumer confidence study**

The objectives of this part of the study were to:

- Establish the level of consumer awareness of the licence scheme for butchers' shops.
- Explore consumer attitudes to the licence scheme.
- Explore consumer understanding and attitudes to food safety in butchery outlets.
- Establish levels of consumer confidence and satisfaction in food safety in butchers' shops.

A stratified sampling plan based on behavioural and demographic criteria was used for the consumer survey. A total of 1,893 meat purchasers in Scotland participated in the survey. The results are shown in the Summary Table of Consumer Responses in Chapter 4.

It was found that 58-82% of consumers, depending on the age group surveyed, were aware of the main food safety precautions which should be taken when handling and cooking raw meat. However, the results showed that their behaviour did not always match the awareness (42-72% depending on the age group surveyed). Clearly, there is still a need to continue consumer education, especially for those aged under 30. For example, although 84% of respondents strongly agreed that it is important for butchers to wash their hands between serving raw meat and ready to eat foods, only 42% of respondents strongly agreed that they watched to ensure this was done. This suggests a possible strategy for improving and maintaining food safety standards in retail outlets is to encourage customers to take a more critical interest in procedures adopted by staff serving them.

## Conclusions

- Butchers' licensing in Scotland was characterised by a failure to determine in advance what precisely butchers were required to do in order to be granted a licence. There was a lack of detail provided by the guidance with respect to premises and procedures. Consequently there was widespread confusion because of the lack of agreement on how to meet the licensing requirements. There were inconsistencies between LAs on what was necessary to be awarded a licence which resulted in a loss of confidence in the authorities.
- As there was no base-line study to establish the level of food safety standards before the *E.coli* O157 outbreak, it has not been possible to determine the extent of any improvement due to initiatives taken immediately after the outbreak or specifically due to the impact of Butchers' Shop Licensing Regulations.
- This study does not provide any convincing evidence that it would be beneficial to extend licensing to other sectors of food retailing.
- In any future initiative, it is essential to provide clear, definitive information on what is expected and how it is to be accomplished. This may be achieved using the approach developed by the British Retail Consortium to devise its Technical Standard for food manufacturers.
- There are fundamental differences between the independent butchers' premises and the retail multiples, which should be taken into consideration in formulating future legislation. For example a number of weaknesses in the Home Authority Principle were identified during the study.
- The fact that, in some instances, FEOs were responsible for providing advice and making recommendations on the award of a license may have produced a conflict of interest.
- When tackling other food sectors, there is a need to conduct background research as a first step to determine:
  - The current level of food safety procedures and any particular risks.
  - The current procedures in place and their effectiveness in achieving acceptable standards of food safety.
  - Type of management and staff.
  - Management commitment to food safety.
  - Availability of suitable training

- Issues which need to be addressed in a national strategy to improve food safety.

The results of the research may provide a sound basis for the development of a Technical Standard, the relevant guidance for the traders as well as the appropriate training and the protocols for inspection.



## 2. INTRODUCTION

Following the serious outbreak of infection with *E. coli* O157 in Central Scotland at the end of 1996, the Secretary of State for Scotland set up an Expert Group under the Chairmanship of Professor Hugh Pennington. The remit was:

“... to examine the circumstances which led to the outbreak in the central belt of Scotland and to advise [him] on the implications for food safety and the general lessons to be learned.”

The Group produced an interim report in January 1997 and the final report was released in April 1997<sup>1</sup>. In respect to practice and hygiene in meat products' premises and butchers' shops, the Group recommended that “HACCP should be adopted in all food businesses to ensure food safety”. The Expert Group recognised that the implementation of the necessary legislation would involve lengthy EU negotiations, and therefore it was likely to take some time. The Group concluded that there was a need for measures to bridge the gap between the legislative position in April 1997 and the effective implementation of HACCP. Therefore, they suggested selective licensing arrangements for premises not covered by the Meat Products (Hygiene) Regulations 1994 should be introduced by new regulations. The Expert Group also recognised that licensing could become unnecessary when HACCP was fully implemented in all premises.

It was clear that the Pennington Group recognised the need for urgent action. It had set an excellent example by reporting within 5 months of being constituted. So there was widespread expectation that the legislation would be introduced very soon after Pennington reported in April 1997.

As a completely separate development, the Scottish Food Co-ordinating Committee (SFCC) and Scottish Enterprise Tayside had prepared a handbook entitled “Risk Assessment for the Smaller Food Businesses”<sup>2</sup>. The purpose of this was to provide assistance for both food businesses and LAs in the implementation of the requirements of Regulation 4(3) of the Food Safety (General Food Hygiene) Regulations 1995. Copies were supplied to all LAs to allow them to be available for use with businesses in their area.

In the immediate aftermath of the Central Scotland outbreak, many authorities took initiatives to improve the standards of food safety in the SMEs within their jurisdiction. Invariably these were to assist businesses implement The Food Safety (General Food Hygiene) Regulations 1995. Many of them used the “Risk Assessment for the Smaller Food Business”<sup>2</sup> as a key element in their strategy. This approach was also regarded as a means of helping the butchers prepare for the licensing exercise, which was expected once the Government had accepted the Pennington recommendations.

In fact, it was almost 3 years before the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations were laid before the Scottish Parliament on 30<sup>th</sup> March 2000, and came into force on 2<sup>nd</sup> October 2000.

The sequence of events prior to implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations licensing are summarised below: Development of Butchers Licensing Scheme

- **November 1996:** *E.coli* 0157 outbreak in Central Scotland. 21 people died and 496 people seriously ill. The Government establish an 'Expert Group' chaired by Professor Hugh Pennington to investigate the outbreak.
- **December 1996:** The Fatal Accident Inquiry is initiated.
- **January 1997:** The Scottish Office consult on the 'health risk condition' and emergency powers of Environmental Health Officers. 33 of 36 responses are received from Scottish Local Authorities and Health bodies. Minimal responses are received from Scottish trade, industry organisations and consumer groups. The majority of Public Health bodies in Scotland indicate that a change to legislation is required.
- **April 1997:** The Pennington Expert Group recommendations are published
- **Summer 1997:** The first Scottish consultation on licensing proposals is initiated.
- **May 1998:** The second consultation in Scotland on UK licensing proposals with a single HACCP route is initiated – views were also taken on the Scheme as proposed by Pennington Expert Group.
- **August 1998:** The findings of Fatal Accident Inquiry are published. The Scottish Office reported on the findings of the consultation and favoured a 'two pronged' approach. In Whitehall, the Pennington report findings were not considered to merit changes to the UK licensing proposals.
- **April 1999:** The Scottish Health Minister delays the decision on the Scottish scheme until the incoming Scottish Executive is in place.
- **July 1999:** The Scottish Executive agrees a revised Scottish consultation paper based on a different, but compatible approach to original UK model. The 312 consultees include main trade groups, retailers, wholesalers, general food producers, scientific and medical groups, local authorities, hospitals, consumer groups, analysts and others.
- **September 1999:** The Scottish Executive consultation ends. 64 responses are received, the majority of respondents are in favour of the proposals, and many responses provide the Scottish Executive with useful drafting points for the regulations.
- **November 1999:** The revised regulations are submitted to the European Commission in Brussels for a mandatory 3-month consultation period.
- **February 2000:** The Draft regulations complete the EU notification process.

- **March 2000:** European scrutiny is completed.
- **29 March 2000:** The Minister for Health in Scotland signs the regulations.
- **30 March 2000:** The regulations are laid before the Scottish Parliament.
- **2 October 2000:** Butchers' Shop Licensing becomes compulsory in Scotland.

The Regulations in Scotland laid down that HACCP had to be in place in order to be awarded a licence. Alternatively, traders could opt for 'strict separation'. The option to apply strict separation was not included in the corresponding Regulations in England. The Food Safety (General Food Hygiene) (Butchers' Shops) Amendment Scotland Regulations, 2000 specified that all food handlers should be trained at least to the standard of the Royal Environmental Health Institute of Scotland (REHIS) or the Royal Society of Health (RSH) Certificate in Essential Food Hygiene. "All Supervisors of persons handling meat working within a butchers' shop must be trained at least to the standard of the REHIS Intermediate Food Hygiene Course or the RSH Certificate in Food Hygiene Management to enable him/her to supervise the food activities in the business and the operation of the HACCP or separation systems." Additionally, the regulations stated "In addition to the existing requirements for supervision, instruction and/or training contained with the Food Safety (General Food Hygiene) Regulations 1995, all persons handling meat in a butchers' shop must have received a level of training in food hygiene to at least the equivalent of the REHIS Elementary Food Hygiene Course or the RSH Certificate in Essential Food Hygiene. New employees should receive this training within six weeks of employment. During this period, they should be closely supervised by a trained member of staff." The English Regulations were less prescriptive and specified training to the standards required to enable food handlers to perform their duties with a view to ensuring that the food in the shop complies with food safety requirements, and in the case of supervisors complies with HACCP procedures.

Guidance Notes which provided clarification on the Regulations were prepared by Food Standards Agency Scotland (FSAS)<sup>3</sup> and issued in May 2000. These explained the terms in the Regulations including the criteria for premises that required a licence. The consultation on the FSAS guidance document continued until the middle of June 2000, and the final version of the guidance document was released on 14th July 2000, shortly before the final date of 21<sup>st</sup> August 2000 for applications to be submitted if a licence was to be issued on the 2<sup>nd</sup> October when the legislation came into force. Many questions still had to be clarified after the initial FSAS guidance document was published, and FSAS set up a question and answer section on their website to tackle this. A revised version of the FSAS guidance document following consultation was issued by 14<sup>th</sup> July 2000 and further updated in April 2001.

"Guidance for Enforcement Officers in Licensing Butchers' Shops in Scotland" was prepared by the Scottish Food Co-ordinating Committee (SFCC)<sup>4</sup> and followed a similar time-scale in its development. The document was issued on the 26<sup>th</sup> July 2000. This included examples of processes and procedures, which were considered to be of acceptable standard for the purposes of licensing. Illustrations of documented HACCP plans were also given. This document was also revised and issued in June 2001 by the SFCC.

The FSAS guidance clearly stated “Ultimately, it is the responsibility of individual businesses to decide, in consultation with their LA, the most appropriate way forward for them” and therefore, there was no specific documentation, which clearly provided guidance to the butchers on how to prepare for licensing.

HACCP is now widely accepted as an effective system for ensuring high standards of food safety. To date, significant progress has been made in applying HACCP in large-scale food manufacturing operations<sup>5</sup>. The Initiative to introduce HACCP into butchers’ shops in the UK is probably the most ambitious undertaken in retail sector in the world to date. The approaches throughout the UK varied within the devolved administrations. In Scotland, the support programme was implemented by individual Local Authorities (LAs) and allowed butchers to use either a HACCP or separation route in contrast to what happened in England, Wales and Northern Ireland, where HACCP was the only option. Furthermore, training and consultancy were provided by the Meat and Livestock Commission in England.

The object of this study was to assess the impact of implementation of improved hygiene practices and food safety management controls in licensed butchers’ shops in Scotland, and to determine what lessons could be learned relating to the practical application of HACCP principles in a small retail business setting.

### **3. LOCAL AUTHORITY STUDY**

#### **Introduction**

The objective of the local authority study was to review the background documentation and to conduct detailed investigations with Food Enforcement Officers (FEOs) in LAs on the introduction of the Butchers' Shop Licensing Regulations in Scotland.

The purpose of this part of the investigation was to obtain the views of those FEOs involved on the implementation of the Butchers' Shop Licensing from the enforcement perspective. Topics included the following:

- Who was responsible for the support programme?
- What was the policy on the support provided?
- How much did it cost to provide support and administer licensing?
- What advice was supplied by the Scottish Executive, FSAS and other bodies?
- Views on the effectiveness of the support programme.
- Any problems caused by implementation of the legislation?
- Any barriers/difficulties?
- Any lessons to be learned about implementing similar legislation in other types of food business?
- Who was responsible for issuing the licences?
- Views on difficulties encountered in the implementation of the legislation.
- Criteria to grant a licence?

#### **Methodology**

A questionnaire was devised in conjunction with FSAS (detailed in Annex A). This was sent to contacts, provided by FSAS, in each LA, usually by e-mail. Replies were received from all LAs in Scotland. Subsequently, there were detailed discussions with the respondents on the telephone, and visits were arranged to meet relevant representative FEOs in all 32 LAs. The surveys were done mainly in February and March 2002, the telephone calls in March and April 2002 and the visits between March and June 2002. In order to achieve consistency, all of this work was undertaken by the project leader.

## Results

### Replies by LAs to questionnaire related to information on butchers

LAs were requested to provide data on the number of staff (FEOs) involved in the licensing exercise, and on the number of licensed butchers' premises in their LA.

Local Authority	Support Programme	Licensing
Aberdeen City	2	16
Aberdeenshire	6	20
Angus	6	6
Argyll& Bute	6	5
City of Edinburgh	6	11
Clackmannanshire	7	7
Dumfries & Galloway	3	4
Dundee City	4	11
East Ayrshire	4	6
East Dunbartonshire	6	4
East Lothian	6	6
East Renfrewshire	6	6
Falkirk	1	1
Fife	1	3
Glasgow City	7	12
Highlands	14	17
Inverclyde	2	3
Midlothian	6	4
Moray	8	8
North Ayrshire	10	10
North Lanarkshire	33	33
Orkney Islands	2	2
Perth & Kinross	4	4
Renfrewshire	3	3
Scottish Borders	6	6
Shetland Islands	2	3
South Ayrshire	1	5
South Lanarkshire	28	28
Stirling	4	4
West Dunbartonshire	2	1
West Lothian	8	8
Western Isles	3	3
TOTAL:	207	260

**Table 2.1 Number of FEO staff allocated to provide help to butchers' preparing for licensing in 2000, and number involved in administration.**

Table 2.1 shows that in most of the LAs, the number of officers providing support and responsible for the licensing was about the same, although in 7 of the authorities a much larger number was involved in the licensing than in providing support. The amount of staff was approximately related to the number of butchers as detailed in Table 2.2. With respect to the staff time devoted to helping the butchers prepare for licensing, in most LAs officers were required to work full-time with the butchers for several months.

<b>Local Authority</b>	<b>Separation</b>	<b>HACCP</b>	<b>Total</b>
Aberdeen City	39	1	40
Aberdeenshire	33	24	57
Angus	0	19	19
Argyll & Bute	6	15	21
City of Edinburgh	12	88	100
Clackmannanshire	2	9	11
Dumfries & Galloway	4	42	46
Dundee City	12	28	40
East Ayrshire	6	31	37
East Dunbartonshire	5	5	10
East Lothian	0	18	18
East Renfrewshire	2	11	13
Falkirk	1	28	29
Fife	18	61	79
Glasgow City	77	115	192
Highlands	4	63	67
Inverclyde	1	19	20
Midlothian	4	15	19
Moray	27	3	30
North Ayrshire	4	31	35
North Lanarkshire	18	55	73
Orkney Islands	1	8	9
Perth & Kinross	7	28	35
Renfrewshire	5	25	30
Scottish Borders	2	48	50
Shetland Islands	7	2	9
South Ayrshire	3	32	35
South Lanarkshire	29	42	71
Stirling	14	21	35
West Dunbartonshire	4	12	16
West Lothian	13	24	37
Western Isles	2	17	19
<b>TOTAL:</b>	<b>362</b>	<b>940</b>	<b>1302</b>

**Table 2.2 Number of licensed butchers' shops in each LA area and the breakdown between HACCP and Separation.**

Table 2.2 shows that there were 72% of all licensed premises which opted for HACCP. However, there were major differences between Local Authorities. In 34% of LA's (11), 89%-100% of premises opted for HACCP, but in 6% (2) of Local Authorities, separation was preferred in 90-97% of premises.

## Replies to questions on the Support Programme

### 1. What guidance did you receive from the Scottish Executive/FSAS on how the programme was to be conducted?

There was some confusion between guidance on support and guidance on licensing in the replies to this question. Once this was clarified, it was clear that there had been no guidance provided, which dealt specifically with the support programme for LAs for butchers' premises.

### 2. Please give details of any courses/workshops, etc. provided/recommended in the guidance.

94% of LAs provided a support programme to help the butchers in their area prepare for licensing. A variety of measures was taken by the LAs to provide courses and workshops for the butchers, which included:

- one to one and/or group workshops/meetings
- meetings with butchers to advise on licensing requirements
- workshops to provide specialised knowledge e.g. on HACCP
- training programmes were organised to assist butchers' to meet the requirements of the Regulations.

### 3. What was the rationale behind this support programme?

The responses to this question from the LAs were very similar. The main reasons given by the LAs for the support programme, were to inform the butchers of the licensing requirements, and help them to comply with the legislation.

Examples of responses were:

- to keep proprietors of small butchers shop businesses apprised of the progress of licensing
- to inform butchers and to give them skills to be able to understand the implications of licensing and allow them to cope more readily with the concept
- to assist all relevant businesses to reach the licensing standards

### 4. What was the take up? How many butchers attended?

The response from the independent butchers to the support programme was very positive with 80% of LAs indicating that 80% or more of butchers in their local area attended training courses and/or workshops. Two LAs commented that the uptake from the multiples (supermarkets) was poor.



**5. Please list any other activities by your department to provide support for the butchers.**

In addition to the formal meetings and training programs organised by 80% of the LAs, there was an enormous amount of informal activity by the LAs. This included one-to-one instruction, assistance and education, drop-in sessions, drop-in consultancy, open invitations to contact/visit office and access to their own personal FEO who was with them from the beginning to the end of the process, offering help and advice throughout, by way of telephone calls or personal visits.

**6. Do you know the cost to the butchers of attending the programme, e.g. hire of staff?**

FEOs found it difficult to give an assessment of the costs to the butchers. However, many local authorities were able to defray some of the expenses incurred by the butchers, especially for training courses. One LA offered one full Intermediate course for each butchers' shop, others provided courses which were subsidised so that the cost to the butchers was as low as £32. However for some butchers the cost was as high as £190. Some LAs provided a grant of up to 50% of the cost to the butcher. In 56% of the LAs the response was nil or not applicable.

**7. Please provide any information on how these activities were received by the butchers.**

In general, the efforts by the FEOs were well received by the butchers (78% of LA's indicated that the activities were well received). In particular, the financial assistance was appreciated.

## **Replies to the questionnaires on licensing**

**1. What guidance did you receive from the Scottish Executive/FSAS?**

In January 1997 the handbook "Risk Assessment for the Smaller Food Business"<sup>2</sup> was issued by the Scottish Office. This had been prepared by the SFCC.

After the Regulations were issued, the two main documents were:

- Guidance Notes on The Food Safety (General Food Hygiene)(Butchers' Shops) Amendment (Scotland) Regulations 2000 were issued by FSAS in May 2000. The revised version of this guidance was issued on 14<sup>th</sup> July 2000 and in April 2001 by FSAS
- Guidance for Enforcement Officers on Licensing of Butchers' Shops issued in Scotland 26<sup>th</sup> July 2000 by SFCC. The revised version was issued by SFCC in June 2001.

However, the position was complicated by the fact that consultation on the guidance produced by FSAS in May 2000 was being carried out until June 2000. FEOs also made use of The Food Safety (General Food Hygiene) Regulations 1995, FSA Guidance on Producing a HACCP System and documents produced by the West of Scotland Liaison Group. Even after the Guidance notes were issued, in May 2000, there were many aspects which had to be clarified, so frequently asked questions were released by FSAS on 4 occasions between August and October 2000. This information was also available on the FSA web-site.

## **2. In your opinion, was this guidance:**

### **[a] appropriate**

71% of the LAs who responded agreed that the guidance was appropriate and 26% of those expressed concern that the guidance was late.

### **[b] comprehensive**

25% answered Yes without qualification. 41% answered Yes with qualification. Lateness was emphasised as a major criticism by 26% of the LAs. The remainder answered No (34%). Specific points raised were:

- “Insufficient guidance on equivalence of training and on operation of the Home Authority Principle.”
- “The problem was that the guidance from both sources was changing too often. We were issuing advice to the trade and then having to retract due to further drafts.”

25% of LAs were critical of the guidance generally. Specific criticisms made included

- Interpretation of legislation was poorly thought through
- Ambiguity
- Contradictory

## **3. Did you devise your own detailed plan on how to implement licensing?**

56% of LAs did develop their own plan. In many cases a special team was established to deal specifically with the licensing process. Others used the SFCC Guidance.

#### **4. Did individual officers have discretion to exercise their own judgement?**

For 63% of LAs the answer was Yes, but with some qualifications designed to achieve consistency.

For example:

- “Working to fairly tight guidelines”
- “All visits had a second officer ~ both officers would need to agree”
- “Officers used a standard check list”
- “Only a small team was used which ensured consistency”

In a few authorities the answer was no, but .....

For example:

- “All determinations were checked by the Principal Officer and Director of Environmental Protection Department”
- “Management monitoring was in place”

#### **5. Please list the detailed criteria which had to be satisfied if a licence was to be granted.**

Various documents were mentioned, i.e. The Food Safety (General Food Hygiene) (Butchers’ Shops) Amendment (Scotland) Regulations 2000, The Food Safety (General Food Hygiene) Regulations 1995 and The Food Safety (Temperature Control) Regulations 1995, but the SFCC Guidance was specifically identified by 50% of the respondents.

#### **6. Did you provide any guidance/instruction on how butchers might choose between HACCP and separation?**

The advice varied. In 10% of LAs it was clear that the emphasis was placed on separation as the preferred option (see Table 2.2). However, in 38% of LAs the emphasis was clearly on HACCP with 88% or more of premises selecting this option. 10% of LA’s concluded that only the supermarkets had the facilities for separation. Other reasons for selecting separation were:

- “The separation route appeared to provide the best probability of success.”
- “Where premises had obvious difficulties understanding HACCP, officers encouraged those premises to follow the separation route.”

**7. Are you aware of any differences between LAs in the way in which the licensing was implemented?**

78% of the responses stated that there were differences between LAs in how the legislation was to be implemented. Some of the comments related to the administration of the licensing process. However, others commented that there were differences between authorities in the interpretation of the guidance.

The main points raised were:

- differences between legislation in England and Scotland
- suitability of certain training courses
- some LAs accepted the opinion of the Home Authority as to the level of compliance of a system whereas others did not
- FEOs were alerted to differences when meeting colleagues from other authorities

**8. Please list any actions taken which involved LAs and SE/FSAS to co-ordinate the approaches taken.**

The publications and initiatives mentioned were:

- Issuing of Frequently Asked Questions (FAQs) by FSAS
- Seminars and meetings organised by the FSAS (January and February 2001)
- Discussions in LA Liaison Groups
- Meetings hosted by Glasgow City Council in November 2000
- LACOTS web-site on Home Authority Principle

**9. Please list any difficulties/problems involved in implementing licensing.**

The same themes were repeated and reinforced time and time again

The main points identified by the Local Authorities were:

- The tight time scale. Butchers needed a licence to trade 6 months after the legislation was enacted. The application had to be submitted to the LA 42 days in advance of the licence being awarded. Hence, there was tremendous pressure on everyone involved to meet the deadline.
- The final version of the Guidance notes was released by FSA Scotland on the 14<sup>th</sup> July 2000 only 6 weeks before the licence application was due for submission.

- The FSAS guidance kept changing and therefore it was unclear to butchers exactly what they had to do in order to be awarded a licence. FEOs were made to look foolish and unprofessional because having given what they believed to be sound advice based on the initial FSAS guidance they then had to go back and change some of their previous advice given to butchers.
- The demand on resources was very heavy and other activities often suffered.
- The concept of HACCP was difficult for some butchers to handle.
- Differences in the legislation between England and Scotland.
- Lack of co-operation from the multiples.
- Home Authority Principle did not work very well, especially when the Home Authority was based in England.
- Non-English speaking traders who had great difficulty coping with documentation and records.
- Confusion about the equivalence of training.

**10. What procedures did you have for resolving disagreements with the butchers?**

34% of LAs specifically stated that there were none or few disagreements. Additionally, 78% of Local Authorities stated procedures were in existence, and when disagreements arose they were resolved quickly. This was done normally by referring the matter to a senior officer who would act as arbitrator.

**11. In general, has the initiative succeeded in achieving improved standards of food safety in butchers' shops?**

In general, the answer to this question was Yes (94%).

However, there were two LA's (6%) which considered that there had been no improvement because satisfactory standards already existed.

The threat of losing a licence was seen as a means of putting pressure on a butcher to rectify any difficulties observed in relation to food hygiene standards.

**Discussions with Food Enforcement Officers**

The purpose of these discussions was to explore in depth the views of the respondents in order to identify the lessons to be learned, which could be applied to other sectors of food retailing.

- [1] There was general agreement that food safety standards in butchers' shops had improved by the time the licence was issued.

However, there was widespread agreement that it would not be feasible to adopt the same strategy with other food retail businesses. The main reason for this answer was that the large number of other food retail businesses would demand significant resources which would not be available within the LAs to allow them to adopt the same strategy. A rough calculation showed that it took approximately one week of an officers' time per butcher to deal with butchers' shop licensing.

- [2] The improvements in food safety may not be attributed to licensing *per se* as most, if not all, LAs had taken action to improve food safety standards as a result of the Central Scotland outbreak.

The Central Scotland outbreak had alerted both LAs and traders to the damage, which can be caused to professional and business reputations by an outbreak of food poisoning. LAs took initiatives to implement Regulation 4(3) of The Food Safety (General Food Hygiene) Regulations 1995 and businesses were receptive at that time.

- [3] FEOs deserve great credit for the efforts they made to support the butchers' shops within their authority. There is no doubt that if the FEOs had not acted promptly, then a large number of the small butchers shops would not have been granted a licence. They would have had to resort to selling solely raw or cooked products and in some cases this may not have been a viable proposition. Therefore they could have been forced out of business. Officers and councillors recognised the vital role that independent butchers play in the local economy.

- [4] FEOs faced considerable difficulties in dealing with licensing. This is evident from the replies to the questionnaires. There was very good agreement that the legislation had been unduly delayed and that the time-scale for implementation of the legislation was far too tight. The problems were exacerbated by the fact that the FSA Scotland Guidance had to be revised based on the consultation process and the final version not released until July 2000. Additionally some LA's were using draft guidance in their discussions with butchers.

- [5] A number of butchers engaged consultants to help prepare for licensing. Some consultants were very competent and reliable, but others were no help whatsoever. Such consultants provided advice that was inadequate or misleading, thereby creating additional problems for the butchers and the FEOs. Butchers who used them probably wasted their money.

- [6] The legislation specifies that:

“all supervisors of persons handling meat in the shop have received a level of training in food hygiene to at least the standard of the Royal Environmental Health Institute of Scotland Intermediate Food Hygiene Course or the Royal Society of Health Certificate in Food Hygiene Management”

This requirement for training was criticised by 59% of LA's, on the grounds that it contained material which was not strictly relevant to butchers (e.g. canning and catering). More importantly, these courses have very little on HACCP.

There were major problems in deciding what other courses were of equivalent standing and, therefore, acceptable for licensing purposes. This applied especially to the multiples, many of which had their own in-house training programmes.

- [7] There were difficulties in the legislation between England and Scotland. This highlighted differences within different branches of the multiples (supermarkets). Many of the multiples had devised HACCP strategies accepted by the Local Authorities in England and objected to the requirement to meet different requirements in Scotland.
- [8] LAs found that they could only meet the demand for resources needed to cope with butchers' shop licensing by taking staff away from other duties, which suffered as a result. More generally, FEOs are faced with a steady growth in responsibilities and this puts increasing pressure on individual members of staff
- [9] Views on the principle of licensing amongst LA's were mixed. A significant number of LA's were not convinced that licensing of other food premises is the way forward. They drew attention to the progress that had been made prior to butchers' shop licensing legislation. Some advocate that the existing food hygiene legislation is sufficient, except that documentation should be included as an additional requirement to Regulation 4(3) of the Food Safety (General Food Hygiene) Regulations 1995. Of those who favour licensing, there are two main reasons for this. One is the requirement for training, which many support. The other is the power to suspend or revoke the licence, which can be used with great effect to "persuade" traders to rectify any deficiencies, as even if a prosecution is successful, the fines imposed may not be very high. The apparent advantage of these powers is that an individual officer can act without having to go to Court. However it emerged that in many LAs it is extremely difficult to prosecute. This is because the decision to prosecute is taken by the Prosecutor Fiscal. Many of these do not consider food safety has a high priority. In contrast, in a few LAs where food hygiene/safety prosecutions are successful, the bad publicity in the local press can have a big impact on recalcitrant food traders.
- [10] Although the relationship between the FSA and FEOs is supposed to be a partnership, many FEOs feel that the FSA is the dominant partner. Most of the information, instruction and guidance is coming down from the FSA to the FEOs, who feel that they have little scope and opportunity to feed information up to the FSA.

FEOs are actively involved at the sharp end and are alerted to emerging new problems and issues at a very early stage yet they believe that at present there are no effective structures that enable them to feed their concerns up to national level.

Furthermore, a number of interesting innovations were encountered in the LAs, which could well be evaluated as examples of best practice and introduced into other LAs as a contribution towards improved performance. One example was a programme aimed at improving consistency across the LA. This consisted of training courses in auditing skills, plus the establishment of procedures to eliminate differences between officers in the approach to inspections.

## Discussion

This study has provided an opportunity to hear the views and opinions all FEOs who were directly involved in the implementation of the legislation on butchers' shop licensing in Scotland. All of the FEOs were extremely positive about the project and welcomed the fact that it had been commissioned by the FSAS.

The principle of licensing and the possibility of extending this specific approach to other sectors of food retailing were examined in depth. 53% expressed the view that it would be unrealistic to repeat the butchers' shop licensing scheme with caterers. The main reason was that there are far too many caterers, therefore, appropriate resources would not be available even if it was deemed to be desirable. Additionally, catering as a whole is a very much more complex area than butchers' shops, for example, there can be a high turnover of staff and many catering businesses employ staff whose native language is not English meaning that the task may be extremely daunting.

LAs already have considerable experience of licensing, and it was recognised there are many different ways in which it can be implemented. There is nothing sacrosanct about the current variant used for butchers. Therefore, it is essential to define precisely the form of licensing envisaged before there is any assessment of the pros and cons.

The suitability of premises for food businesses could be determined by a system of prior approval for new businesses. It is not necessary to have an assessment every year. It could be done every three years as long as the premises are inspected annually to verify compliance. Another variant would be to award a licence to a new business once certain conditions have been fulfilled. This could then function in the same way as a driving licence, so that the person running the business risks losing the licence as a sanction if the law is contravened.

With respect to the principle of butchers licensing, the views of the FEOs varied enormously. Some were in favour, mainly because of the powers to suspend or revoke a licence. This has proved to be very effective in "persuading" butchers to take action, which an FEO considered essential. On the other hand, it is pointed out that HACCP will become a requirement in the next few years in order to comply with EU legislation. If licensing is to be introduced on top of all this, it would undoubtedly add to the complications. It is worth noting that the Pennington Group favoured the adoption of HACCP by all food businesses to ensure food safety, and that "licensing may become unnecessary when HACCP has been fully implemented in all premises".



## **4. EVALUATION AND SURVEY OF LICENSED BUTCHERS' PREMISES IN SCOTLAND**

### **Introduction**

The objective of this part of the study was "To provide validated evidence of the impact of the butcher's licensing scheme on food hygiene standards in retail butcher shops including an assessment of the operation of the Hazard Analysis and Critical Control Point (HACCP) principles in practice".

A representative selection of butchers' shops in each LA was visited, in order to obtain the views of proprietors and managers in licensed premises in Scotland on the Butchers' Licensing initiative, and to conduct an evaluation of food safety procedures and documentation (HACCP) in each of the premises. It was especially important to obtain the views of those directly involved on how Butchers' Licensing had been implemented, with particular emphasis on any difficulties encountered, the costs involved and the support received.

### **Methodology**

#### **Survey of Butchers**

A questionnaire was devised in collaboration with FSA Scotland (see Annex B) and piloted in 15 butchers' premises. The points addressed in the questionnaire included the following:

- The key food safety issues
- Have these issues been addressed in the Initiative?
- What advice/support did the butcher receive from the LAs and independent consultants?
- What costs were incurred by the butcher to implement separation or HACCP to fulfil the requirements to be issued a licence by their LA?
- Was the business disrupted by any changes that had to be put in place?
- What were the benefits to the business?
- What were the main changes needed to the premises?

#### **Assessment of Butchers' Shops**

The assessors were selected and participated in a preliminary meeting to draw up the draft protocol. This protocol was then piloted by each assessor in three butchers' shops. After a further meeting, the protocol was agreed (Annex C). Arrangements were made for a Quality Assurance exercise to be done, with Janet Wilkinson, an experienced third party auditor, who accompanied each of the assessors when visiting a butchers' shop. Her report is Annex D. Brief details of the assessors' qualifications and experience are given in Annex E.

In Scotland there is a total of 1302 licensed butchers. 15% were selected for a visit by one of our assessors. Lists of licensed butchers in all LA areas were obtained from the FEOs in each LA. Initially, butchers were approached by a letter requesting an appointment and enclosing a copy of the questionnaire to be completed before the visit. The response to this approach proved to be very poor, with 90% of butchers not responding. Therefore the strategy for the survey was changed and

butchers were approached directly by telephone. It proved somewhat difficult to persuade them to participate, sometimes 3 or 4 different businesses within a LA had to be approached in order to make one appointment. Local managers, within the multiples (supermarkets) were initially not prepared to agree to a visit. However, once clearance had been obtained from the Head Office, no further difficulties were encountered.

Many of the butchers were actively involved in the preparation of cooked products such as roast meat (44%), black pudding and haggis (57%). Although it was intended to include representation from small chains of 2-10 shops, the difficulties described above in recruiting butchers meant this was not feasible. Eleven halal butchers were included. Premises were visited in all LA areas (Table 3.1) which ensured that there was a good representation from urban and rural areas. 24% of the visits were to multiple retailers (Table 3.2) and breakdown between HACCP/Separation was 128 HACCP, 60 separation, 5 claimed to have both and 5 did not know (Table 3.3).

<b>Local Authority</b>	<b>Total number of premises visited</b>	<b>Independents</b>	<b>Supermarkets</b>
Aberdeen City	4	2	2
Aberdeenshire	7	3	4
Angus	3	3	0
Argyll & Bute	6	4	2
City of Edinburgh	13	11	2
Clackmannanshire	2	1	1
Dumfries & Galloway	7	6	1
Dundee City	7	6	1
East Ayrshire	6	4	2
East Dunbartonshire	4	3	1
East Lothian	6	3	3
East Renfrewshire	4	3	1
Falkirk	4	1	3
Fife	14	11	3
Glasgow City	35	28	7
Highlands	7	4	3
Inverclyde	3	3	0
Midlothian	3	2	1
Moray	6	5	1
North Ayrshire	4	2	2
North Lanarkshire	11	10	1
Orkney Islands	3	3	0
Perth & Kinross	2	1	1
Renfrewshire	4	4	0
Scottish Borders	3	3	0
Shetland Islands	3	3	0
South Ayrshire	3	1	2
South Lanarkshire	8	7	1
Stirling	6	3	3
West Dunbartonshire	1	1	0
West Lothian	6	6	0
Western Isles	3	3	0
<b>TOTAL</b>	<b>198</b>	<b>150</b>	<b>48</b>

**Table 3.1 Total number of premises visited in each Scottish Local Authority area**

Total Independents Surveyed	150
Total Supermarkets Surveyed	48
<b>Total</b>	198

**Table 3.2 Number of supermarkets and independents visited in Scotland**

Those surveyed using HACCP	128
Those surveyed using Separation	60
Those surveyed using both	5
Didn't know	5
<b>Total</b>	198

**Table 3.3 Breakdown between HACCP and Separation. This is the opinion of the person surveyed and does not always reflect the category of licence granted.**

## Results of the Survey

The collated responses to the questionnaire are shown below.

### Background Information

#### Which processes are conducted in the business?

		Number of Super markets	% Super markets	Number of Butchers	% Butchers
1	Receive fresh meat or poultry	48	100	150	100
2	Store fresh meat or poultry	48	100	150	100
3	Cut and prepare fresh meat and/or poultry	45	94	147	98
4	Display open and packed fresh meat/meat products	46	96	145	97
5	Store and sell fish/fish products	37	77	27	18
6	Store and sell frozen goods	39	81	92	61
7	Manufacture fresh sausages and/or burgers	11	23	125	83
8	Cure meats	1	2	41	27
9	Prepare haggis and/or black pudding	0	0	85	57
10	Pack and deliver customer orders	19	45	90	60
11	Boil meats (and other wet) cooking processes	0	0	102	68
12	Roast meats (and other dry) cooking processes	23	48	66	44
13	Prepare any stir fry and/or marinated products	20	42	99	66
14	Prepare and bake hot pies	2	4	73	49
15	Prepare and bake cold pies	5	10	76	51
16	Display open and/or packed cooked meats	44	92	120	80
17	Display open and/or packed cooked cheeses	43	90	72	48
18	Display other ready to eat foods	44	92	102	68
19	Store packaging and wrapping materials	47	98	148	99
20	Store cleaning chemicals	47	98	149	99

(n=198;48 supermarkets,150 butchers)

**Table 3.4 Summary of processes conducted in shops**

Table 3.4 shows the actual processes which were conducted within the shops, and demonstrates that a selection of premises was included in the survey. The major differences observed between supermarkets and independent butchers related to the manufacture and preparation of various products. For example, 57% of the independents prepare haggis and/or black pudding, whereas this process is carried out in 0% of supermarkets. Although there are no wet cooking processes in the supermarkets e.g. boiling of meat, it is noteworthy that 48% of them roast meat (usually chicken on a rotisserie). The data presented for supermarkets refers only to the butchery area, therefore products prepared elsewhere are not included e.g. in-store bakery.

In the independent butchers, other processes and products included sandwiches, potted meats, smoked fish, pickled meats, salad bars, hot soup and cream cakes. There were 5 shops preparing ready meals (e.g. lasagne and curry) and 6 shops, which had vacuum packing equipment.

### **Summary of responses from supermarkets and butchers' premises on Training**

#### **Have you or your supervisory staff taken REHIS Intermediate Food Course or RSH Certificate in Food Hygiene?**

90% of supervisory staff in supermarkets and 95% of supervisory staff in butchers had taken the REHIS Intermediate Food Course or the RSH Certificate in Food Hygiene. These are the courses specified in the butcher's licensing legislation.

#### **Have you or your supervisory staff taken an equivalent qualification?**

Those who did not take the qualifications required by the legislation were permitted to satisfy the licensing conditions with a qualification deemed to be of equivalent standard. This applied to 13% of the supermarkets and 8% of the butchers.

#### **Was the training done before the Butchers' Licensing became law (i.e. before 30<sup>th</sup> March 2000)?**

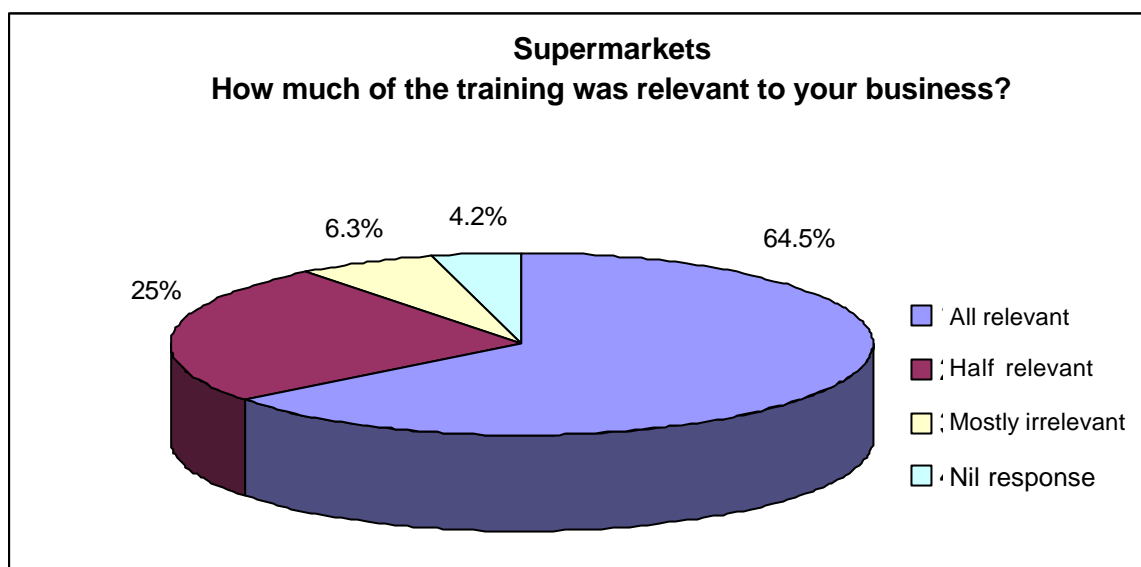
The results show that 27% of supermarkets and 37% of butchers had done their training prior to the legislation being placed before Parliament.

15% of supermarkets and 5% of butchers indicated that some training had been done before and after the 30<sup>th</sup> of March 2000. Where people had entered the trade after the 2nd October 2000 then the training was done after licensing was introduced.

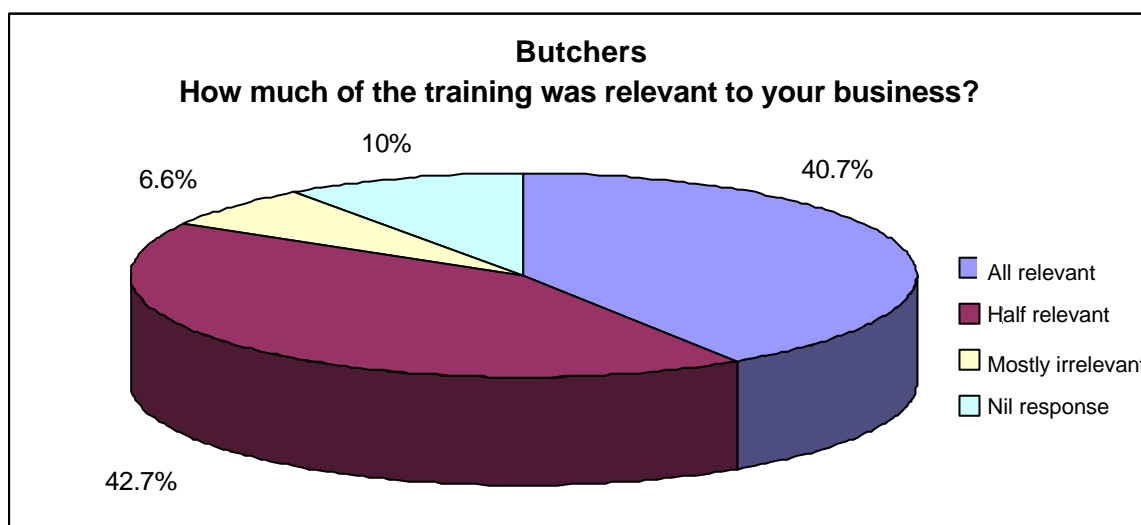
#### **Did the training give you sufficient knowledge of HACCP/Separation?**

In the supermarkets, 75% of the respondents considered the training gave sufficient knowledge of HACCP/Separation, but the figure was only 51% for the independent butchers.

## How much of the training was relevant to your business?



**Figure 3.1a** Relevance of training in supermarkets



**Figure 3.1b** Relevance of training in butchers' shops

With regard to relevance of the training, 65% of respondents from supermarkets said all of it was relevant, but with the butchers only 41% stated it was relevant (Figure 3.1a and b)

Most of the training for the supermarkets is done in-house and is therefore tailored to the job function. On the other hand, most of the independent butchers attended open courses which were not necessarily directed specifically at their trade.

### **Have all your staff received training to the elementary level?**

88% of respondents from supermarkets and 87% of the butchers said that staff had received training to the elementary level.

### **Did you have any additional formal training about HACCP?**

The proportion who had additional formal training about HACCP was 27% for supermarkets and 25% for butchers. These values are relatively low, in view of the fact that HACCP is one of the options to meet the licensing conditions and that the Intermediate Food Course has minimal coverage of HACCP.

### **Did you have chance to meet with other butchers and Food Enforcement Officers at seminars/meetings?**

63% of the independent butchers had been involved in meetings organised by LAs with other butchers as part of the preparation for licensing, but only 40% of the supermarkets participated in these meetings. This is a reflection of the fact that the supermarkets have their own in-house technical resources, but the independent butchers are largely dependent on external resources and had to rely on their FEOs for help and support.

### **Was this before the Butchers' Licensing became law (i.e. before 30<sup>th</sup> March 2000)?**

33% of butchers and 17% of supermarkets had done training before the Butchers' Licensing became law. 1% of butchers had done training before and after 30th March 2000.

### **Preparation for Licensing**

	HACCP	Separation	Both	Don't Know
Supermarkets	33	14	1	0
Butchers	95	46	4	5
All	128	60	5	5

**Table 3.5 Breakdown between HACCP and Separation.**

The breakdown between HACCP and separation is shown in Table 3.5. 65% selected HACCP. A small number of butchers (3%) considered that they had both HACCP and separation, and probably reflected the fact that there was considerable emphasis on separation in the implementation of HACCP.

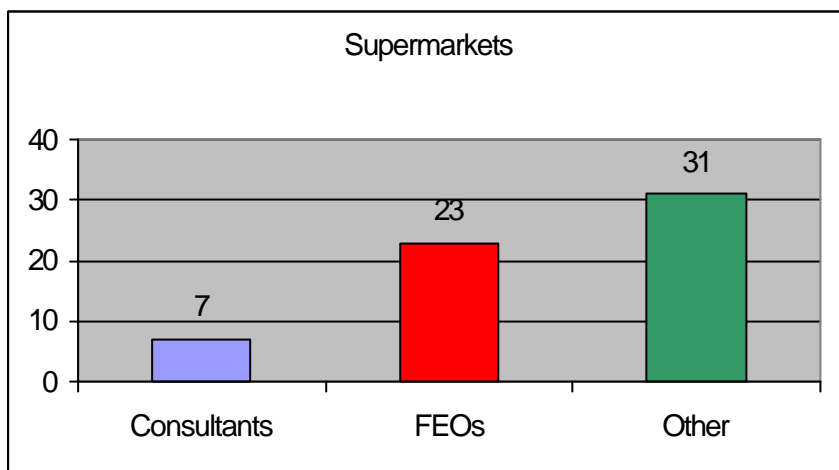


### Did you receive help to ensure you were able to achieve HACCP/Separation?

85% of supermarkets and 96% of butchers did receive help with HACCP/separation .

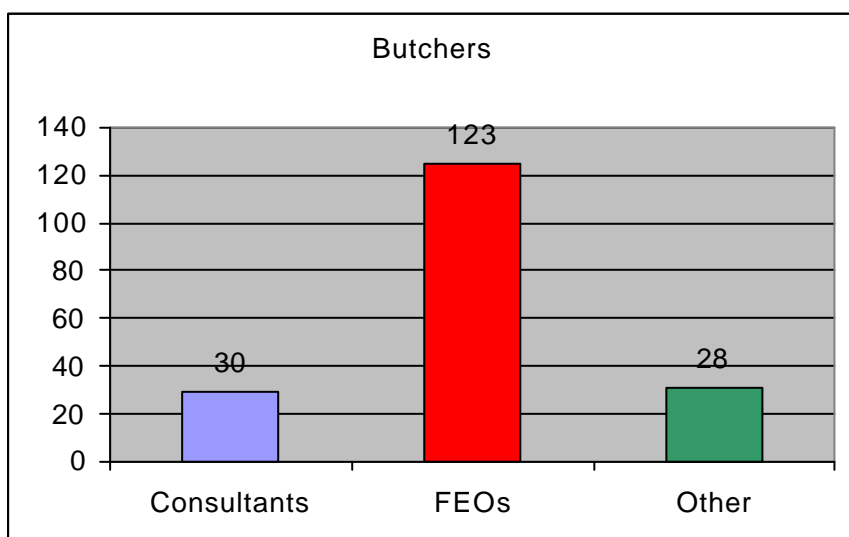
If yes, did you receive help from:

- i) Consultants?
- ii) FEOs?
- iii) Other?



**Figure 3.2a Sources of help for implementation of HACCP/Separation in supermarkets**

50% of the support for supermarkets is classified as “others”, which usually was “in-house” specialists (Figure 3.2a). Some businesses received help from more than one source.



**Figure 3.2b Sources of help for implementation of HACCP/Separation in butchers**

For the butchers, 68% had support from the FEOs. The “others” (15%) included family, colleagues in the trade and trade associations (Figure 3.2b).

**Was the help received highly satisfactory, satisfactory or poor?**

<u>Supermarkets</u>	Highly Satisfactory		Satisfactory		Poor	
	Number	%	Number	%	Number	%
Consultants	4	57	3	43	0	0
FEOs	19	83	4	17	0	0
Other	29	94	2	6	0	0

**Table 3.6a Views on quality of help received by supermarkets**

<u>Butchers</u>	Highly Satisfactory		Satisfactory		Poor	
	Number	%	Number	%	Number	%
Consultants	16	53	12	40	2	7
FEOs	81	66	35	28	7	6
Other	20	71	8	29	0	0

**Table 3.6b Views on quality of help received by butchers**

100% of the supermarkets considered the help as highly satisfactory or satisfactory (Tables 3.6a). For the butchers, 93% of consultants, 84% of the FEOs and 100% of others were considered highly satisfactory or satisfactory.

**Did you have any particular difficulties preparing for HACCP/Separation?**

Only 15% of supermarkets encountered difficulties preparing for HACCP or separation, whereas 45% of the independents did. This is largely a reflection of the resources, which the supermarkets allocate to technical support.

**If yes, the reasons were:**

<b>Supermarkets ~ number of respondents 7</b>	Number		Number
a) Timescale too short	4	b) No firm guidelines available in time	2
c) Difficulty in understanding how to prepare	4	d) Lack of suitable training	0
e) Any other reason	1		

**Table 3.7a Difficulties in preparing for HACCP/Separation in Supermarkets**

The tight timescale and difficulty in understanding how to prepare were mentioned by 4 of the 7 supermarkets who reported problems.

<b>Butchers ~ number of respondents 67</b>	Number		Number
a) Timescale too short	26	c) No firm guidelines available in time	34
d) Difficulty in understanding how to prepare	33	d) Lack of suitable training	17
e) Any other reason	21		

**Table 3.7b Difficulties in preparing for HACCP/Separation in butchers**

67 butchers encountered difficulties, a variety of different reasons were given (Table 3.7b). The very tight time-scale was mentioned repeatedly in discussions with butchers and FEOs. This factor clearly magnified the impact of the other reasons mentioned.

**How much has it cost you to achieve the present standards?**

Expenditure	Supermarkets	Butchers
Zero	28	22
£1,000 and under	10	61
£1,001 - £10,000	10	49
£10,001 - £50,000		13
£50,001 and over		5
	48	150

**Table 3.8 The breakdown of expenditure, which was linked to the implementation of licensing.**

Table 3.8 shows that 58% of the supermarkets and 15% of the independents did not report any expenditure. 61 of the independents and 10 supermarkets spent less than £1,000. This was mainly on training and minor structural alterations or equipment. A substantial number (10 supermarkets and 49 independents) spent between £1,001 and £10,000. A small number (18) spent even more. This was usually because the approach of licensing had acted as a spur to finance major improvements. One independent butcher had a major structural refit, which cost approximately £250,000. These sometimes necessitated structural alterations and the purchase of new equipment. Expenditure of this order clearly demonstrates confidence in the future for the business. It should be emphasised that for a number of butchers the financial resources available were very limited, so that expenditure had to be kept to a minimum.

**Did you receive direct or indirect financial assistance, and if so, from what source?**

None of the supermarkets and 32% of the independent butchers received financial support. Usually this was from the LA in the form of a contribution towards the cost of training. Most LAs were keen to provide support for the independent butchers to help ensure their survival. Licensing did not represent a threat to the viability of supermarkets, and so there was no pressure to provide them with assistance. The amounts reported varied between £75 to £800 per butcher.

**Has Licensing improved Food Safety in the shop?**

Only 46% of the supermarkets believe that licensing has resulted in an improvement in food safety, but 70% of butchers do.

**Supermarkets**

If yes - in what ways? Number of respondents 21		If no, in what ways? Number of respondents 24	
a) Greater awareness of what can go wrong	20	f) Already had the highest standards	23
b) More systematic approach	8	g) Food safety had already been reviewed after the E.coli outbreak in E.coli O157	6
c) Staff work better together	9	h) New procedures are too complicated	1
d) Awareness of strict separation	16	i) Far too much documentation	1
e) Records are kept	13	j) Other reasons	2

**Table 3.9a Reasons for answer to previous question for supermarkets**

In the supermarkets, the main reasons why food safety improved was because of greater awareness of what can go wrong and awareness of strict separation (Table 3.9a). Where food safety had not improved, 96% stated that this was because they already had the highest standards.

## Butchers

If yes - in what ways? Number of respondents 106		If no, in what ways? Number of respondents 34	
a) Greater awareness of what can go wrong	102	f) Already had the highest standards	24
b) More systematic approach	53	g) Food safety had already been reviewed after the E.coli outbreak in E.coli O157	8
c) Staff work better together	39	h) New procedures are too complicated	6
d) Awareness of strict separation	84	i) Far too much documentation	9
e) Records are kept	64	j) Other reasons	8

**Table 3.9b Reasons for answer to previous question for butchers**

With the butchers, all the possible reasons were identified for those who believed food safety standards had improved (Table 3.9b). However, as with supermarkets, the main reason why there was no improvement was because the standards of food safety were already very high (71% of this group). 24% also mentioned that there had been a review of procedures after the E.coli O157 outbreak.

## Customer Expectations

### **Do your customers know you have a licence?**

The proportion of customers of butchers' shops who are aware of the licence (74%) was much higher than for the supermarkets (40%).

### **Does the licence improve customer confidence in your products?**

48% of supermarkets and 38% of butchers believe the licence improves customer confidence.

### **Do you ever remind customers to keep raw and cooked meat separate?**

Most (66%) butchers remind customers to keep raw and cooked meat separate. The value is lower in the supermarkets (52%).

## Results from assessment of licensed premises

Assessors were instructed to evaluate the following characteristics:

Management Commitment  
 The HACCP System/Separation  
 Implementation and Documentation  
 Support from the LA in preparing for Licensing  
 Standards of Food Safety in Premises

A - Excellent  
 B - Fully acceptable  
 C - Acceptable  
 D - Room for some improvement  
 E - Totally unacceptable

### Management Commitment

	TOTAL (%)	Supermarkets (%)	Butchers (%)
A	86 (43.5)	18 (37.5)	68 (45.3)
B	47 (23.7)	13 (27.1)	34 (22.7)
C	34 (17.1)	10 (20.8)	24 (16.0)
D	19 (9.6)	2 (4.2)	17 (11.3)
E	1 (0.5)	0 (0)	1 (0.7)
Nil response	11 (5.6)	5 (10.4)	6 (4.0)
Total	198 (100)	48 (100)	150 (100)

**Table 3.10 Assessment of management commitment in supermarkets and independent butchers.**

These results show that in 44% of the shops visited the management commitment was considered to be excellent, and that in about 84% of the shops it was acceptable.

Many of the independent butchers visited were considered to be first class businesses. Comments from assessors included:

- “Professional, high standards, self-motivated. Excellent approach.”
- “This was the BEST butchers’ shop I’ve ever visited in terms of cleanliness, maintenance, attention to detail, presentation standards. Immaculate.”
- “Tiny little shop tucked into the middle of a huge council estate. Amazingly enthusiastic chap. Sells huge range of products. Has a website and e-mail. Did his HACCP plan well before legal requirements in August 1998. Enjoyed doing it! Built up regular clientele on the estate.”

It is important to recognise that the independent butchers have been under intense competition from the multiples for many years, and consequently many of them have closed. Therefore, those that have survived must provide a good service and be efficient. Some butchers decided to cease trading because of the licensing

legislation. We encountered one butcher who was on the point of closing because of licensing ~ he felt “he was too old for all the changes and going back to ‘school’”. However, the FEOs had encouraged him to carry on. His daughter, a teacher, had helped him with the training and with the preparation of a HACCP plan, encouraging him to stay in business.

With regard to the supermarkets, the results were very similar to those found for the butchers.

### HACCP/Separation

	TOTAL (%)		Supermarkets (%)		Butchers (%)	
A	31	(15.7)	10	(20.8)	21	(14.0)
B	75	(37.9)	20	(41.7)	55	(36.7)
C	45	(22.7)	9	(18.8)	36	(24.0)
D	21	(10.6)	0	(0)	21	(14.0)
E	9	(4.5)	4	(8.3)	5	(3.3)
Nil response	17	(8.6)	5	(10.4)	12	(8.0)
Total	198	(100)	48	(100)	150	(100)

**Table 3.11 Assessment of the system for HACCP/Separation in supermarkets and butchers**

It is interesting to note that the percentage considered to be excellent (16%) is much lower than was found for Management Commitment (44%). It would be expected that where management commitment is excellent that the food safety system would also be of a high standard. Comments from the assessors suggested several possible reasons for this:

- “Butchers hired consultants who helped to install systems that were unnecessarily complex.”
- “Plan is more than is necessary to keep the system simple and manageable.”
- “Critical Control Points (CCPs) had not been identified properly on the flow chart.”

We also identified some quite serious deficiencies. Examples of reports from the assessors included:

- “HACCP plan has many holes ~ delivery procedures not included, plus some very strange CCP decisions, e.g. cross-contamination in display cabinets not a CCP.”
- “Flow diagrams have no relationship to hazard analysis. Hazard analysis seems to be at random. Many hazards and controls are missed.”
- “Appears to be a typical butchers’ shop pre HACCP i.e. plans being done now but hidden at the back of a cupboard ..... The company accountant wrote the HACCP plans.”

There were a number of supermarkets where the management commitment was rated as A, but the food safety system was rated lower because the HACCP was not available in the store. This highlighted a major weakness in the multiples which usually have a HACCP Plan devised and kept at HQ. Essentially, this is a generic plan and in some stores the company plan had not been adapted to meet the local requirements.

### Implementation and Documentation

	TOTAL (%)		Supermarkets (%)		Independents (%)	
A	36	(18.2)	10	(20.8)	26	(17.3)
B	81	(40.9)	26	(54.2)	55	(36.7)
C	43	(21.7)	6	(12.5)	37	(24.7)
D	17	(8.6)	0	(0)	17	(11.3)
E	8	(4.0)	1	(2.1)	7	(4.7)
Nil response	13	(6.6)	5	(10.4)	8	(5.3)
Total	198	(100)	48	(100)	150	(100)

**Table 3.12 Assessment of implementation and documentation in supermarkets and independent butchers**

These results are very similar to those obtained for HACCP/Separation with 18%A, 41%B and 22%C for documentation, compared with 16%A, 38%B and 23%C for HACCP/separation.

Our assessors encountered a number of shops where the implementation was first class. Examples included:

- “All (documentation) very good and up to date.”
- “No doubt at all that the HACCP system is being fully used. Records are archived onto a PC. and a floppy disk back-up kept.”
- “This butcher just got on with it and is an example of ‘best practice’ that is evident throughout the area.”
- “Most butchers received new skills on computers to enable them to produce HACCP and specific documentation applicable to their operations not generic ‘off the shelf systems’”.
- “Policies and procedures are clear and easy to follow.”
- “Simple, easy to follow and well organised, a very good standard. FEO asked for a copy to show other butchers.”
- “Paperwork neat and up to date. Doesn’t take much time. ‘Not a problem’ according to the butcher”.



There were also examples, however, of documentation, which was inappropriate. For example:

- “Record keeping is, in my opinion, over the top. It is up to date, but butcher admits not always done. This recording system loses the focus of the critical issues and takes too long and too much time to manage.”
- “Two-stage check list of personal hygiene. Did staff wash hands after toilet? Did staff wear clean overalls? Do they really expect these to be filled in by each staff member? OTT! Paper overload. Crazy. What use is it?”
- “There are temperature control records for 2002 but these go from Jan – Dec!!!”
- “Record keeping stopped 10 days ago.”

While there are obviously some businesses which give cause for concern, there are also many shops where the documentation and implementation are excellent and could be used as examples of ‘best practice’.

### Support from FEOs

	TOTAL (%)		Supermarkets (%)		Independents (%)	
A	48	(24.3)	10	(20.8)	38	(25.3)
B	49	(24.7)	11	(22.9)	38	(25.3)
C	57	(28.8)	13	(27.1)	44	(29.4)
D	18	(9.1)	0	(0)	18	(12.0)
E	4	(2.0)	0	(0)	4	(2.7)
Nil response	22	(11.1)	14	(29.2)	8	(5.3)
Total	198	(100)	48	(100)	150	(100)

**Table 3.13 Assessment of support from FEOs by supermarkets and independent butchers**

As a general rule, the support from FEOs was considered to be acceptable or better in 87% of businesses. This finding is in agreement with the results of the questionnaire and the views of the FEOs themselves. Some examples of comments from the assessors:

- “Owner was very enthusiastic about help from local FEOs ~ couldn’t have coped without them.”
- “Full of praise for LAs ~ very helpful.”
- “FEOs gave quality time after initial work was completed by the butcher. FEO was seen as part of the HACCP team.”

The visits to butchers have provided very convincing evidence that the interpretation of the guidance and the requirements demanded for licensing do vary considerably. Specific examples include:

- “Told him (butcher) to put in non-hand operated taps and then after he’d put in elbow taps, told him it would have to be infra-red or knee ~ so wasted £200 - £300. He knows of a few butchers to whom this happened. All very cross.”
- “Two FEOs came out on the 2<sup>nd</sup> pre-license inspection and the two of them stood in his shop arguing about cook-cool times and temperatures.”
- “Butchers felt there was inconsistency in interpretation and different standards from one LA to another”.

There were also comments from representatives of the multiples. Invariably each multiple has a company-wide policy and there were numerous complaints from them about the fact that the requirements differed between LAs. Those based in England were also critical of the fact that procedures, which were acceptable in England were not acceptable to some of the Scottish LAs. Our assessors have also reported differences between LAs. For example, in one the pre-license inspection took almost 4 hours with 2 inspectors, whereas in another one inspector spent 20-30 minutes in the shop. This conclusion is based on visits to at least 6 businesses in each LA.

### Food Safety Standards

	TOTAL (%)	Supermarkets (%)	Independents (%)
A	55 (27.8)	15 (31.3)	40 (26.7)
B	66 (33.3)	19 (39.5)	47 (31.3)
C	42 (21.2)	7 (14.6)	35 (23.3)
D	17 (8.6)	1 (2.1)	16 (10.7)
E	4 (2.0)	0 (0)	4 (2.7)
Nil response	14 (7.1)	6 (12.5)	8 (5.3)
Total	198 (100)	48 (100)	150 (100)

**Table 3.14 Assessment of food safety standards in supermarkets and independent butchers**

The key question our assessors were asked to answer “Would you shop in these premises?”

The results show that 82% of the businesses were considered to be acceptable or better with respect to food safety standards. Examples of comments on high standards were:

- “The shop was immaculate. Staff know about hygiene and procedures. “
- “Very high standards of hygiene and house-keeping ~ good separation and practices.”

- A model independent butcher.”
- Ethos of continuous improvement evident for many years.”
- All food safety tasks were posted at every control point.”
- “Excellent standards. The company implemented a good HACCP system which is understood and used by the manager.”

We encountered a few shops where there was some cause for concern, for example:

- “Thinks HACCP is in place but not sure if HACCP is supposed to be in place. No evidence of strict separation either.”
- “I observed very definite unsafe procedures and wouldn’t be happy shopping at those premises. Butcher served raw meat and was then asked for cooked pies, went and got 2 different sizes (unwrapped) out of a fridge and brought them to the customer leaving fridge door open. The unsold pie was then left on the raw meat counter for the remainder of our interview before being put back in the fridge.”
- “Lack of hand washing between raw/cooked.”

3% of independent butchers were assessed as totally unacceptable with respect to food safety.

### **Multiple Retailers/Supermarkets**

In multiples, a company-wide HACCP strategy driven by the Head Office is put into place locally. In 31% of the stores visited the food safety standards were excellent. In theory these strategies should be rigorously enforced across the company by the in-house auditors.

Nevertheless, examples were identified which demonstrated that there could be weaknesses. Of the 37 stores, which had opted for HACCP, 12 did not have the plan available - it was kept centrally, raising doubt that policies and procedures were being followed. One manager did not know if the license was for HACCP or separation. Cross-contamination was not always strictly controlled in 4 stores. In one store cream cakes were observed being transported on the same trolleys as raw meat. In another, the raw meat display was observed next to the cooked fish and the same staff used to serve customers in both areas.

On 2 occasions staff were asked if chicken being cooked on a rotisserie failed to reach the correct temperature, and if so, what would they do. The reply was:

“They always do!” Which obviously means they are not alert to the possibility that something can go wrong.

Another concern was that the company HACCP plan may not be tailored to meet the specific conditions, which apply within an individual store. In any given company, there can be major differences between stores. So, for example, the deli staff may have to go through a raw area to get to their changing room.

## Discussion

This study provides information on the current standards of food safety in butchers' shops and large multiples in Scotland, including the views of the butchers on licensing and on how it was introduced. In 82% of shops, the standards were satisfactory and there was general agreement that there have been significant improvements in food hygiene safety since the Central Scotland outbreak. Nevertheless, 3% of butcher' shops visited were of an unacceptable standard and, therefore, constant vigilance must be maintained by the LAs.

46% of the multiples and 70% of the independents believed that food safety in the shop had improved as a result of licensing. 96% of these cited "greater awareness of what can go wrong" as one reason for the improvement. Other factors mentioned were "more systematic approach", "staff work better together", "awareness of strict separation" and "records are kept" as contributory factors.

On the other hand, 50% of the multiples and 23% of the butchers believed that licensing did not have any impact on food safety standards. The main reason mentioned was that they believed that they already had high standards. Many also mentioned that food safety had been reviewed after the Central Scotland *E.coli* O157 outbreak and changes implemented in their premises. Initiatives had been taken in 1997 and 1998 to address food safety in butchers' shops as a direct result of the *E.coli* O157 outbreak and of the Pennington Expert Group report: e.g. action to implement Regulation 4.3 of The Food Safety (General Food Hygiene) Regulations 1995. As no studies were conducted prior to the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations, no information was available which could be used as a basis for comparison to this study. It is relevant to note that 33% of the butchers had actually completed their Intermediate training before licensing was introduced.

45% of the butchers, but only 15% of the multiples, reported difficulties in preparing for licensing. The main factors related to the tight time-scale and to the lack of firm guidelines, so it was not clear what was actually required. A lack of suitable training was mentioned by 11% of independent butchers but not by any of the multiples. In some areas courses were just not being run, which meant that it would have been necessary to travel a long way to attend. A number of LAs made arrangements for training courses to be held in their areas.

Support for the preparation was provided by consultants, FEOs and "others". For the multiples it was primarily from "in-house" staff, although FEOs were also involved. With the butchers the predominant source of support was the FEOs. Well over 90% of them were considered to be highly satisfactory or satisfactory.

The legislation specified that one member of staff should have the REHIS or the RSH Intermediate Food Hygiene qualification. Those who did not take either of these qualifications took an equivalent one. In the supermarkets, 65% of the

respondents considered all the course to be relevant, whereas 41% of the independents considered it to be relevant.

75% of the respondents from the supermarkets and 51% of the butchers believed that the training provided them with sufficient knowledge of HACCP/Separation. The result for the butchers is somewhat surprising, as the Intermediate courses contain very little information on HACCP. By contrast, the emphasis in the supermarkets is on “in-house” courses, which are tailored to the company-wide strategy.

The implementation of licensing was stressful for many of the butchers. The very tight time-scales coupled with the lack of definite guidelines at the outset exacerbated the pressures, as if a license was not granted, this would mean that the butcher could not trade in both raw and cooked meat products. Therefore the business may not be viable.

It was found that there are wide variations in the interpretation of the legislation and in the requirements necessary to be granted a license. With respect to HACCP/separation, in 6 LAs over 90% chose the HACCP option and in 21 LAs over 70% chose HACCP. By contrast, in 2 LAs over 90% selected the separation option.

The inconsistencies in the requirements to meet the conditions for licensing, which have been reported in the LA Study and in this section (Support from FEOs), have highlighted a serious problem with the implementation of the licensing. This is because in some cases it has entailed unnecessary expenditure for butchers which certainly could not be justified. These also undermine the credibility of the authorities

There were also differences between food safety systems and in the nature of the documentation, which is considered to be acceptable, or is regarded as a requirement. Some of them were simple and effective, so that the procedures, including documentation, were readily incorporated into the routine of the business. At the other end of the spectrum, there were examples of complicated systems that were cumbersome and awkward to implement. As a general rule, the more complex the system the more likely it is that the procedures will not always be followed and the documentation not kept up to date. ‘Slippage’, i.e. failure to keep up-to-date with documentation was observed on a number of occasions. This issue was often mentioned in discussions with FEOs.

There were also differences noted in the inspection procedures. In one LA, premises inspections were conducted by two officers who spent 4 hours on each inspection. In another LA, it only took one officer less than one hour per inspection. However, it should be noted that FEO inspections may range in time due to a variety of factors such as the type of business premises, risk category of premises etc. and as such should not be anticipated to be of a standard duration.

Finally, it is important to recognise that the multiple retailers differ in many respects from the independent butchers. Data from the Meat and Livestock Commission shows that over 70% of the fresh meat sold in Scotland is through the multiples. Some of these do not need to have a licence because they are deemed to be exempt.

## **5. CONSUMER CONFIDENCE IN BUTCHERS' LICENSING AND ATTITUDES TO FOOD SAFETY IN SCOTLAND**

### **Introduction**

The objective of this survey was to obtain the views of consumers on the butchers' shop licensing initiative and on the standards of food safety within butchers' shops.

A stratified sampling plan based on behavioural and demographic criteria was used for the consumer survey. The consumer study was implemented as an interview survey of 1893 meat consumers in Scotland in order to:

- Establish the level of awareness of the licence scheme for butchers.
- Explore attitudes to the licence scheme.
- Explore consumer understanding and attitudes to food safety in butchery outlets.
- Establish levels of confidence and satisfaction in food safety in butchers.

### **Methodology**

#### **Survey Instrument**

A structured, interviewer administered survey was developed to address these objectives. The content was designed in line with the overall project objectives and in consultation with the FSAS. It comprised four questions on shopping habits and eight variables concerning reasons for choosing a meat outlet. Knowledge of food safety and related behaviour were explored through six questions on each and respondents were also asked about their awareness of licensing. Categorical questions covered age group, size of household, socio-economic group, meat consumption habits and shopping behaviour.

#### **Sample**

The sampling frame was customers' of butchers' outlets in areas of Scotland identified as targets in the evaluation programme. A stratified sampling plan based on behavioural and demographic criteria was designed. The minimum number of each unit of assessment was 50 and the actual sample profile is detailed below. The sample was based on quotas of consumer groups based on the criteria of behaviour (type of outlet, high and low users) and demographic profile (age, socio-economic group and family size). Table 4.1 gives the minimum sample sizes of the strata and Table 4.2 presents the final actual sample size of each subgroup.

Sample stratification						
Outlet	Butchers shops					Supermarkets
Meat habits	Heavy users				Light users	
Age	Young			Older		
SEG	ABC1		C2 DE			
Family size	Sm all	Large				
Quota	50	50	100	200	400	800
Sample	1600					

**Table 4.1 Sample stratification - minimum sample size**

## Implementation

The survey was conducted between May and July 2002 by a team of fieldworkers. Respondents were recruited in shopping situations, in the proximity of high street butchers, supermarkets and general shopping areas. Quota and inclusion criteria were checked before the respondent was asked to complete the survey.

## Data Management and results

The completed questionnaires were screened for completeness and validated for appropriate sampling criteria and the data managed in SPSS10. The internal reliability of the data was confirmed with a Cronbach alpha of .86, which means that the internal consistency of the data is strong, meeting Nunnally's<sup>6</sup> recommended standard of a Cronbach alpha  $\geq 0.7$ .

Total 1893															
Butchers 908								Supermarket 985							
Heavy 432				Light 476				Heavy 451				Light 534			
<30 214		30+ 218		<30 222		30+ 254		<30 228		30+ 223		<30 213		30+ 321	
Abc1 106	C2de 108	Abc1 107	C2de 111	Abc1 118	C2de 104	Abc1 127	C2de 127	Abc1 125	C2de 103	Abc1 119	C2de 104	Abc1 109	C2de 104	Abc1 153	C2de 153
S 52	L 54	S 51	L 57	S 56	L 51	S 50	L 61	S 57	L 61	S 52	L 52	S 66	L 61	S 66	L 61
S 61	L 64	S 50	L 53	S 53	L 66	S 52	L 52	S 53	L 56	S 52	L 52	S 78	L 75	S 74	L 94

**Table 4.2 Actual sample sizes for each sub-group**

## Results

### Consumer Responses

A summary of the results is shown in Table 4.3. 26% of respondents always buy meat from an independent butchers' shop, while 23% always buy pre-packed meat from a supermarket. The lower value of 12% for those who always buy raw meat from a supermarket is a reflection of the fact that many of them only sell pre-packed raw meat.

Cleanliness (82% very important) and safety of the food (81% very important) were the predominant factors influencing choice of where to purchase meat. By contrast, friendliness (30% very important) and personal attention (26% very important) were not major influences.

The majority were aware of the precautions that should be taken when handling raw meat. 82% strongly agreed that it is important to keep raw and cooked meat separate during preparation and cooking. Approximately the same proportion (81%) strongly agreed that it is important to store cooked and raw meat separately in the fridge. 84% strongly agreed that it is important that butchers wash their hands between serving raw meat and ready to eat foods. However, only 58% strongly agreed that packages of raw meat and cooked food should be kept separate in shopping bags. Furthermore, 17% had no opinion on this precaution.

It is interesting to note that the responses on behaviour were not quite so positive as those for awareness. Although 82% strongly agreed that it is important to keep raw and cooked food separate during preparation and cooking, only 72% agreed strongly with the statement 'I am always careful to keep raw meat and ready to eat foods separate when I am cooking'.

Even more significant is the fact that 84% agreed strongly that it is important for butchers to wash their hands between serving raw meat and ready to eat foods. Yet only 42% agreed strongly they always ensure that butchers wash their hands between serving raw meat and ready to eat foods. This reduction may be partially explained by the fact that it would not apply to those who purchase pre-packed meat in supermarkets.

Nevertheless, when considering those who buy their meat at butchers' shops, about 83% strongly agree that it is important that butchers wash their hands between serving raw meat and ready to eat foods, but only 52% watch to ensure that they do.

Over half (52%) strongly agreed that the government had taken measures to improve food safety in butchers' shops, but only 40% knew that butchers need a special licence to sell both raw and cooked food. This contrasts with the results from the butchers' survey ~ 78% of the independents believed that their customers knew they needed a licence. The value for the multiples was very similar to that found for consumers (41%).

### **Impact of demographics**

The impact of demographic variables was explored using Chi<sup>2</sup> test<sup>7</sup>. This test compares the expected results, if no independent variable influence was present, with the actual distribution of responses. The test compares the mean differences between observed and expected results and predicts the significance of this difference, given the degrees of freedom at the 95% confidence level.

A statistically significant difference between the observed and the expected results, indicates an association between the independent, or fixed, variables (in this case, the demographics) and the dependent variable (in this case, the behaviour, knowledge and attitudes of respondents). The purpose of this research was to understand the differences in behaviour, knowledge and attitudes of the various demographic sub-groups. Thus each demographic variable was cross-tabulated with each of the behaviour, knowledge and attitude variables to see where and in



which direction, relationships of association were to be found. The results are shown in Table 4.4.

**Shopping habits:** Those who shop mainly at a butcher's shop consider quality of meat, friendliness, food safety, personal attention and cleanliness more important factors in choosing a meat retailer than do those who shop predominantly at supermarkets. Supermarket shoppers value price, convenience and modernity more highly.

Supermarket shoppers are more likely to agree that that the government has taken steps to ensure safer meat.

Those shopping at butchers understand food safety issues most and handle meat in an appropriate way.

**Level of consumption:** Heavy meat consumers value convenience and cleanliness, whilst light meat eaters consider quality, price and a modern shop more important than others. Though light users are more aware of government measures on food safety and more confident now than in the past, it is heavy users who are more aware of the licensing scheme. Heavy users tend to understand food safety issues, though it is the lighter users that indicate more appropriate behavior.

**Age:** The older group is more likely to shop at butcher's shops. Convenience is important most to younger consumers, whilst those over 30 value quality, price, friendliness, attention and modernity more than younger consumers. Those over 30 are both more knowledgeable about food safety and careful in the keeping and preparation of meat. The older group is more aware of policy and confident in their purchasing of meat.

**Socio-economic group:** The ABC1 group rates quality more importantly and the C2DE group see price, friendliness and modernity as more important factors than the others. The C2DE feel more confident buying meat now than in the past. The ABC1s are more aware of policy, food safety issues and report more cautious food handling behaviour.

**Size of household:** Larger households are more likely to shop at a supermarket and value price as a factor in this choice. Small households value quality, friendliness, attention, convenience and modernity more than larger households. There is a tendency towards smaller households being more knowledgeable about food safety issues and displaying behaviour in keeping with this.

## Discussion

It is clear that a majority of those surveyed is aware of the steps, which need to be taken to avoid risks when handling or cooking meat. Nevertheless, a substantial proportion was unable to express an opinion when asked about the precautions which should be taken. It is also highly relevant that the awareness is not always matched by behaviour. So there is still a need for consumer education on the food safety aspects of meat, especially the importance of keeping raw meat and ready to eat foods separate in shopping bags. The results also indicate that there should be an emphasis on younger people (under age 30).

A very high proportion of respondents were aware of the importance of butchers washing their hands between serving raw and ready to eat foods, but only about half of those strongly agreed that they would watch to ensure that this was done. This suggests a possible strategy for improving and maintaining standards of food safety in retail outlets is to persuade customers to take a more critical interest in the procedures adopted.

<b>Buying Meat Consumer survey summary responses Shopping habits</b>					
	always	sometimes	never		
How often do you buy meat from a local, independent butcher's shop?	26%	53%	21%		
How often do you buy <b>raw meat</b> from a supermarket counter?	12%	57%	31%		
How often do you buy <b>pre-packed</b> raw meat from a supermarket?	23%	57%	20%		
<b>Reasons for choosing where to shop</b>					
	very important	important	no opinion	unimportant	very unimportant
Quality of meat	75%	22%	3%	-	-
Price	47%	37%	9%	5%	2%
Friendliness of the people	30%	34%	25%	9%	2%
Safety of the food	81%	14%	4%	-	1%
To get personal attention	26%	28%	29%	13%	4%
Convenience	44%	37%	14%	5%	1%
Cleanliness	82%	14%	3%	1%	-
A modern shop	23%	27%	28%	16%	6%
<b>Food safety knowledge and awareness</b>					
	strongly agree	slightly agree	don't know/ no opinion	slightly disagree	strongly disagree
It is important to be careful to keep raw and cooked foods separate during preparation and cooking.	82%	13%	5%	-	-
It is important to store cooked and raw meat separately in the fridge.	81%	13%	6%	-	-
Raw meat should be kept below cooked foods in the fridge.	73%	11%	15%	1%	-
It is important that butchers wash their hands between serving raw meat and ready to eat foods.	84%	10%	6%	-	-
Bags of raw meat and cooked foods should be kept separate in shopping bags.	58%	23%	17%	2%	-
It is important not to let food get too warm before I get it home.	66%	20%	12%	1%	1%
<b>Food safety behaviour</b>					
	strongly agree	slightly agree	don't know/ no opinion	slightly disagree	strongly disagree
I always watch to make sure that butchers wash their hands between serving raw meat and ready to eat foods.	42%	17%	29%	7%	5%
I worry about germs from meat wrapping getting on to other food.	45%	29%	21%	4%	1%
I am careful about where I buy meat because I worry about how safe it is.	56%	25%	17%	2%	-
I am always careful to keep raw meat and ready to eat foods separate:					
in my shopping bag	51%	21%	23%	4%	1%
in the fridge	75%	16%	9%	-	-
when I am cooking	72%	14%	13%	1%	-
<b>Policy and licence</b>					
	strongly agree	slightly agree	don't know/ no opinion	slightly disagree	strongly disagree
Following some large outbreaks of food poisoning in the late nineties, the government has tried to ensure safer meat counters and butcher's shops.	52%	21%	23%	3%	1%
I feel more confident buying meat from butchers now than in the past.	34%	25%	28%	8%	5%
Do butchers need a special licence to sell both raw and cooked meat	Yes 40%	No 5%	Don't know 55%	I have asked my butcher if he has a licence	
				Yes 6%	No 94%
<b>Respondent profile</b>					
Age		Size of household		Socio-economic group	
Under 30	46%	Small (1 or 2)	49%	ABC1	51%
30+	54%	Large (3+)	51%	C2DE	49%
Meat consumption			Shopping habits		
Every day	4-6 days/week 11%	2-3 days/week 36%	1 day a week 10%	rarely 7%	butcher's shop
					supermarket 52%
<b>Sample: meat eaters in Scotland, n=1893.</b>					

**Table 4.3 Summary table of consumer responses**

Differences between demographic groups					
Question	Shopping	Consumption	Age	SEG	House
<b>Shopping habits</b>					
How often do you buy meat from a local, independent butcher's shop?	Butcher's	Heavy	Old		
How often do you buy raw meat from a supermarket counter?	Supermarket		Old		Large
How often do you buy pre-packed raw meat from a supermarket?	Supermarket	Heavy*	Young	ABC1 (never)	Large
<b>Reasons for choosing where to shop</b>					
Reasons for choosing source: quality of meat	Butcher's*	Light	Old	ABC1	Small
Reasons for choosing source: price	Supermarket	Light*	Old	C2DE	Large
Reasons for choosing source: friendliness of people	Butcher's		Old	C2DE	Small
Reasons for choosing source: safety of the food	Butcher's*				
Reasons for choosing source: to get personal attention	Supermarket		Old		Small
Reasons for choosing source: convenience	Supermarket*	Heavy*	Young		Small
Reasons for choosing source: cleanliness	Butcher's	Heavy			
Reasons for choosing source: a modern shop	Supermarket	Light*	Old	C2DE	Small
<b>Food safety knowledge and awareness</b>					
It is important to be careful to keep raw and cooked foods separate during preparation and cooking.		Light	Old	ABC1	
It is important to store cooked and raw meat separately in the fridge.		Heavy	Old	ABC1	Small
Raw meat should be kept below cooked foods in the fridge.			Old	ABC1	Small
It is important that butchers wash their hands between serving raw meat and ready to eat foods.			Old	ABC1	
Bags of raw meat and cooked foods should be kept separate in shopping bags.	Butcher's		Old	ABC1	
It is important not to let food get too warm before I get it home.	Butcher's	Heavy	Old	ABC1	
<b>Food safety behaviour</b>					
I always watch to make sure that butchers wash their hands between serving raw meat and ready to eat foods.	Butcher's	Light	Old		Small
I worry about germs from meat wrapping getting on to other food.	Butcher's	Light	Old	C2DE	Small
I am careful about where I buy meat because I worry about how safe it is.	Butcher's		Old	C2DE	Small
I am always careful to keep raw meat and ready to eat foods separate: shopping bag	Butcher's*	Light	Old	ABC1	
I am always careful to keep raw meat and ready to eat foods separate: fridge			Old	ABC1	Small
I am always careful to keep raw meat and ready to eat foods separate: during cooking	Butcher's	Light	Old	ABC1	
<b>Policy and licence awareness</b>					
Following some large outbreaks of food poisoning in the late nineties, the government has tried to ensure safer meat counters and butcher's shops.	Supermarket*	Light	Old		Small
I feel more confident buying meat from butchers now than in the past.	Butcher's	Light	Old	C2DE	Small
Do butchers need a special licence to sell both raw and cooked meat	Butcher's	Heavy	Old		
What year was the licence introduced?					
I have asked my butcher if he has a licence	Butcher's		Old		
n-1893 confidence: 95% * 90% confidence					

**Table 4.4 Differences between demographic groups**

## 6. CONCLUSIONS

The licensing of butchers' shops in Scotland was characterised by a failure to reach agreement on precisely what butchers were required to do in order to be granted a licence under Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations in Scotland. The FSAS guidance produced in May 2000 stated that "It is the responsibility of individual businesses to decide, in consultation with their LA, the most appropriate way forward for them." However, it was not until both parties were faced with the practicalities of implementing the legislation that many of issues were identified. These included:

- the criteria for deciding between HACCP and separation,
- the conditions which must be fulfilled if a shop is to be exempt from licensing,
- the items which should be considered as ready-to-eat,
- the type of hand washing facilities,
- the type of cleaning fluid to be used,
- the necessity for a pest control contract,
- how much documentation is required,
- how long should records be kept,
- the need for separate display cabinets for raw and ready-to-eat foods,
- standardisation of cooling times for joints and pies,
- frequency of temperature recording,
- how to define a CCP,
- the importance of headgear,
- the need to protect light bulbs and fluorescent tubes,
- what is acceptable as "wrapped".

In view of the very tight time scale and the resources required to implement the legislation, it was quite impossible for LAs to co-ordinate their actions so that agreement on all these points could be achieved. Essentially, the FEOs had to make decisions as they went along. As the guidance was open to interpretation by each LA it was inevitable that there would be differences between LAs in the criteria needed to meet the requirements for licensing.

Additional problems were caused by changes made to the initial guidance issued by FSAS. This meant that FEOs had to inform butchers that earlier advice they had given to them no longer applied. FEOs commented that they were embarrassed and butchers were resentful when this occurred. It is to the great credit of traders and FEOs that they managed to cope despite the difficulties encountered. The most important lesson for any future initiatives is that thorough preparation must happen before legislation is drafted, so that the requirements necessary for implementation are clearly defined in terms readily understood by the traders. As far as possible, there should be agreement between Government, FEOs and trade organisations on precisely what is expected and how it is to be achieved.

## **Lack of consistency in the implementation of the requirements for Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations**

The most serious issue identified in this programme was the lack of advance agreement on how to meet the requirements for Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations.

This was clearly demonstrated for the following reasons:

- Variation between LAs in the breakdown between HACCP and separation licenses granted ranging from over 95% separation to 100% HACCP.
- The study in butchers' shops, provided many examples of inconsistencies on the implementation of the licensing, not only between LAs but also between officials employed within the same LA.
- The collected views of Head Office staff of the major multiples (supermarkets). These gave a unique perspective as the multiples have stores located in many different LAs. The multiples encountered difficulties as they were faced with different demands and interpretations from different LAs.
- Views expressed by representatives of the butchers' trade organisations
- Many FEOs have identified a lack of consistency within and between Local Authorities in the implementation of the Butchers' Shop licensing initiative as a matter of major concern.

There is no question that inconsistencies were partly due to the fact that the legislation had been poorly planned. Additionally, questions that arose during the implementation of the legislation had not been anticipated, and these were exacerbated by the unrealistic short time-scale for the implementation of the requirements of the legislation. The significance of this cannot be over-estimated. The fact that precise definitive guidelines and protocols were not available to the trade or to the FEOs was extremely frustrating for everyone involved. Butchers quickly realised that the requirements for implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations differed between LAs. Inevitably, this led to the conclusion that the Local Authorities were uncertain about what was needed to ensure acceptable standards of food safety, as measures could be deemed to be essential in one Local Authority, but not in another. Therefore it is not surprising that the butchers' questioned their relevance to food safety.

Many independent butchers had, therefore, implemented procedures simply to meet the requirements for licensing in order to remain able to sell raw and cooked meat products NOT because they were convinced the measures were necessary to provide safe food. Furthermore, some butchers perceived that they had to fulfil more stringent conditions than others to be awarded a license in some LAs and this tended to breed resentment within the trade.

Most important of all, the lack of consistency in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations across the board undermined the credibility of the LAs, and was

therefore not conducive to achieving high standards of food safety. One of the key lessons to be learned from the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations was that careful planning and preparation should be carried out before implementing any new programme within another food sector. In future initiatives it will be essential to detail precisely what is expected from the relevant food sector and how this can be achieved.

## **Nature of the business: Retail multiples (supermarkets) and independent butchers' premises**

This part of the study clearly demonstrated that there were fundamental differences between the multiples (supermarkets) and the independent butchers' premises in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations.

Compared to the independent butchers, the multiples (supermarkets) had considerable financial and technical resources. In Scotland, multiples are responsible for the sale of over 70% of the fresh meat. The Multiples operate across the UK with policies and strategies being devised by a Head Office team, usually located external to Scotland. These policies and strategies are then applied across all the UK stores and usually enforced by in-house auditors.

There were many complaints from the multiples involved within the study that the standards required in England differed from those required in Scotland in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations. This was partly caused because the legislation implemented in Scotland was not the same as that implemented in England. However, the lack of consistency in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations between Local Authorities in Scotland was again highlighted by the multiples. A few LAs in Scotland attempted to impose their own unique requirements on the multiples. These were usually resisted, but the representatives of the multiples stated that they had to spend time and effort resolving these issues when they arose with the relevant LA. There was no evidence to show that the multiples made any significant changes to their company-wide systems as a result of objections made by the FEOs with respect to licensing.

Ideally, the Home Authority Principle should have eliminated most of these problems, but in practice there were some serious weaknesses. For example some Scottish LAs found that the Home Authority in England could not provide the information needed to implement the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations because the issue had not been required within the English legislation. A good example of this was the equivalence of training. Secondly, there were some conflicts between LAs and the Home Authority regarding the division of responsibility. Thirdly, the LAs in Scotland, which adopted the role of Home Authority did not have the resources to fulfil everything that was expected of them.

For future licensing initiatives and changes in enforcement of food safety legislation, the critical differences between the multiples and the independent butchers' premises must be recognised. FEOs have a long history of dealing with small businesses in their own areas. The implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations has illustrated

that an important aspect of the FEOs role is to provide support and guidance to their local businesses. Multiples, however, do not need or indeed expect this kind of assistance. Enforcement of legislation by LAs within independent butchers' premises is relatively straightforward, as the local FEO would deal directly with the owner or manager of the local business. For the multiples, it could be proposed that this should be a 2-stage process, firstly to evaluate the company-wide system and secondly to determine the effectiveness with which the system is being implemented in individual stores within the LA area. A logical approach may be for the Home Authority to evaluate the company system, and for the LA to determine how effective the system is being applied in the stores in their area.

In reality, Home Authorities do not have the resources and/or the experience to conduct a thorough evaluation of the company systems. These company systems can include quite sophisticated techniques and procedures that are not familiar to FEOs. On the other hand, FEOs dealing with individual stores often raise objections to aspects of the company system.

When visiting the supermarket stores during the study, the food hygiene standards observed were usually very good. The multiples were conscious of the need to maintain standards of food safety in order to protect their brand. In-house auditors are used extensively to evaluate food hygiene standards with multiples.

Nevertheless, FEOs and our own assessors identified problems within multiples, in relation to food safety, which need to be addressed. These problems mainly arise as all stores have their own individual characteristics. As a consequence, problems can occur. For example, staff of a delicatessen may have to walk through a raw chicken area to get to their changing room. There were also instances where staff did not understand what they had to do to comply with basic food safety for example, temperatures were not maintained, raw and cooked foods were kept together and the wrong concentration of cleaning material was being used. This leads to the conclusion that the in-house auditors are not correctly identifying all the deficiencies, or that appropriate action is not being taken as a result of auditors' reports. These weaknesses may be eliminated if there was more widespread use of independent, external auditors.

## **HACCP/Separation**

It is clear that the interpretation of HACCP and separation varied between LAs. In some local authorities, virtually 100% of the licences were for HACCP while there were a few where the main emphasis was on implementation of separation.

A number of local authorities in Scotland have strongly advocated HACCP because they are convinced that all businesses will eventually be required to have HACCP.

Allowing for the two options, HACCP and separation, in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations which were significantly different from the Regulations in England, contributed to the disputes between FEOs and representatives of the multiples, especially those with headquarters in England. Some of the confusion may have been avoided if HACCP had been specified as the only option. As far as possible, separation should be an important element in any HACCP plan within a butcher's shop.



## **Training**

The training requirements specified in the legislation were unsatisfactory because they were not specific for butchers' premises. This meant that butchers had to learn about topics such as canning and aspects of catering which were not relevant to their business activities. The intermediate food hygiene courses specified in the legislation have little coverage of HACCP and there was no requirement for training on this subject, even though it was of critical importance to all of those butchers' who chose the HACCP option. Any training which butchers are required to undertake should have provided them with appropriate guidance and instruction to take whatever steps were necessary to obtain a licence. In practice, butchers who had obtained the requisite training still had to seek additional help and advice to prepare for licensing form their LA.

The short time scale in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations also caused difficulties in relation to training. Some of the butchers had taken the courses but the examination results had not been released before the legislation came into force. Others did not pass the examination. FEOs were advised by FSAS that, in the circumstances, they were to conduct an interview to determine if the person had an adequate understanding of food safety. FEOs expressed dissatisfaction during the study about this as:

- They felt they were unqualified to conduct, what was effectively, an oral examination.
- To allow a person to be granted a licence while not passing the examination, undermined the training requirement specified in the legislation.

## **Time scale**

The Regulations were laid before the Scottish Parliament on 30<sup>th</sup> March 2000 and were to be enforced by 2<sup>nd</sup> October 2000. Applications had to be made six weeks in advance, so that butchers and FEOs had only four months in which to devise and implement strategies to meet the requirements of the legislation. The time scale was criticised by both FEOs and the butchers as being far too short. Consequently there was great pressure placed on everyone involved. FEOs had to divert resources to provide support for the butchers and to deal with the licensing administration. As a result some of the other duties and responsibilities within LA's were neglected. The difficulties were magnified by the fact that there had been very little, if any preparation for the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations. Some LAs did make attempts to prepare the butchers in advance but these were largely speculative as they could not be sure what precisely would be in the legislation.

The guidelines produced by FSAS changed after the consultation process was completed with the final version released in July 2000, shortly before the final date of 21<sup>st</sup> August when applications for licences had to be submitted to the LA. Even after this, questions continued to arise about issues that had to be clarified by FSAS

In view of the short time scale in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations, some of the

butchers employed consultants. In a number of cases the advice given was inappropriate. This meant that the butchers had taken action on advice from these consultants which did not meet the legislative requirements, hence the money spent was largely wasted.

## **Administration of the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations**

In Scotland, FEOs were responsible for providing support, especially to the independent butchers. They were also responsible for all the decisions on the award of a license. This created the potential for a conflict of interest in the sense that a refusal of a license could reflect badly on those colleagues advising the butchers.

In future, the supporting role could be kept completely separate from the licensing function, so that it is objective.

## **Impact of the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations**

What lessons can be learned from the experience of the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations in butchers' premises?

The most important finding to emerge from this study is that any initiative to improve food safety is dependent on providing clear definitive information on what is expected and how it is to be achieved in individual businesses. The effectiveness of compliance is a separate issue and the introduction of new licensing must be considered in that context. Any conclusion about the value of licensing based on the experience of the butchers in Scotland is essentially conjecture. It has not been possible to assess the extent of improvements in food safety because of the lack of a base-line and the failure to agree on the requirements for licensing. The critical factor contributing to any improvements has been the substantial input of financial and human resources primarily by the LAs. This could have been done without the licensing legislation. Therefore this study does not provide any convincing evidence that it would be beneficial to extend licensing to other sectors of food retailing. The priority must be to anticipate problems and develop robust procedures so that inconsistencies are avoided and the trade can be provided with clearly defined requirements for achieving acceptable standards of food safety.

Among the FEOs there is no agreement. Some were strong advocates, while others were opposed to any extension of licensing. Those in favour believed that licensing was a means of achieving acceptable food safety across the retail meat trade and could eliminate the 'cowboys'. It must also be emphasised that some butchers actively supported licensing because it helped to improve the image of the trade. A few butchers made use of their licence to help promote their business.

The powers to suspend or revoke a licence were seen as a means of pulling backsliders into line. Those who do not support licensing argued that the existing powers were adequate and it was simply a matter of using them. One of the attractions of licensing is that the threat to suspend or revoke was very easy to

implement and a few LAs had used this approach to good effect. By contrast, a prosecution under existing legislation can require long and detailed preparation. It is also relevant that many FEOs find it very difficult to persuade the Procurator Fiscal to take a prosecution dealing with food matters to Court. It is evident that most of the concerns about poor standards of food safety were with owners/managers of food businesses that were irresponsible or incompetent. When the existing legislation (i.e. excluding Butchers' Licensing Regulations) was enforced, this can be sufficient to deal with such traders. At least one LA in Scotland reported applying this strategy with success.

Even with licensing, as this study has shown, a small number of traders were identified with poor standards of food safety. However, there were also butchers who had excellent, fully acceptable or acceptable standards of food safety but had HACCP plans with weaknesses and/or which were not being properly implemented.

The vast majority of butchers are only too well aware of the consequences for their businesses if they were responsible for an outbreak of food poisoning. It is virtually certain that they would take the necessary precautions to avoid this happening, but they had to be convinced that there are compelling food safety reasons for doing so. Therefore, in future, it is crucial to devise clear, consistent, objective requirements, which can be justified. If this can be achieved it is likely that these requirements would be implemented by the butchers in order to protect their businesses.

## **The potential way ahead**

In the light of the experience with the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations, if progress is to be made in other retail sectors such as catering, it could be essential to develop a standard protocol. There is a precedent for this, namely the British Retail Consortium (BRC) Technical Standard for Companies Supplying Retail Branded Food Products. This Technical Standard was devised because suppliers to the retailers had to cope with a succession of audits conducted by their retail customers. Not only were these expensive in time and resources, but there were major discrepancies between the auditors in what was expected. Essentially, they were experiencing a lack of consistency very similar to what has been found in this study. The Standard provides a common basis for the certification of companies based on an independent third party auditor. To ensure credibility, all auditing has to be accredited by the UK Accreditation Service (UKAS). The Standard includes the adoption and implementation of HACCP. It has proved to be extremely successful and has now been extended to many other countries. The approach has also been applied to storage, distribution and packaging. It is possible that the same strategy could be applied to retailing and catering. by the following mechanism.

Firstly, it will be necessary to classify the retail sector into groups containing businesses where the same approach to food safety can be applied. For example, an independent restaurant will differ from a multi-national corporation. Secondly, each group should be investigated to determine:

- Current level of food safety and any particular risks
- Current procedures and their effectiveness in achieving acceptable standards of food safety
- Type of management and staff
- Management commitment to food safety

- Training requirements
- Issues which need to be addressed in a national strategy to improve food safety

This would provide an insight into the improvements that may be needed. It would also act as a baseline against which any initiative on food safety can be judged. Thirdly, a Technical Standard could be devised for each of the categories identified, which would define precisely what is required to achieve acceptable levels of food safety.

Each Standard would require guidance to be developed to explain how the standard could be implemented. The guidance would provide details on the way HACCP is to be applied. This should be related to the nature of the business. The draft standards and guidance could be tested out in practice with a series of pilot studies.

The Technical Standard would be the critical step. Once that had been developed, then all the other components of the programme, guidance, training and inspection protocols, could follow on. If all those involved, Government, LAs and the trade could agree in advance on what is required, then there would be a common purpose which is an essential prerequisite for the initiative to be successful.

## **7. RECOMMENDATIONS**

### **Butchers' Licensing**

#### **Food Enforcement Officers**

1. The study has identified lack of consistency in the implementation of the Food Safety (General Food Hygiene) (Butchers Shops) Amendment (Scotland) Regulations between LAs and even between individual offices within the LA's in Scotland. This issue requires to be addressed as a matter of urgency. In the longer term, the use of standards (see Recommendation 9) could make a major contribution towards achieving this consistency.
2. Responsibility for providing support for the trade should be kept totally separate from the responsibility for decisions on licensing.

#### **Independent butchers premises**

3. There were many examples of very good practice in which the HACCP or separation systems in operation were effective, efficient and user-friendly. However, there were others, which were unwieldy and not always implemented properly. The policies and procedures, which worked effectively should be written up as case studies and disseminated widely to LAs and traders.

#### **Retail Multiples (supermarkets)**

4. The multiples were conscious of the damage a food safety incident can do to the brand image. The stores were audited regularly, but usually by in-house auditors. Independently validated external auditing has proved to be very successful in food manufacturing. The potential for using this approach in food retailing could be investigated.
5. The Home Authority Principle has been widely criticised and should be thoroughly reviewed.

### **Lessons to be learned when applying similar initiatives to other sectors**

#### **Preparation and planning**

6. There should be thorough preparation before any initiative designed to improve food safety is implemented.
7. Within any sector the way in which risks are controlled is likely to vary depending on the type of business or organisation. As a first step, they could be classified into coherent groups so that appropriate strategies could be developed for each one.
8. Then each group should be investigated to determine:
  - Current level of food safety and any particular risks.

- Current procedures and their effectiveness in achieving acceptable standards of food safety
- Type of management and staff
- Management commitment to food safety
- Training issues
- Issues which need to be addressed in a national strategy to improve food safety

The information obtained would provide a sound basis for developing future strategies.

### **Standards**

9. A Technical Standard should be devised for each business category, which defined precisely what would be required to achieve acceptable standards of food safety within that business.
10. For each standard, guidance should be developed to explain how the standard could be implemented. In particular the guidance could provide details on the way HACCP could be installed in an effective manner within that business.
11. Research could be needed to prepare such guidance. This would consist of pilot studies to determine how the draft standards and guidance would work in practice.
12. Relevant trade representation should be actively involved in the development and implementation of any new standards.

### **Training**

13. The training should be closely related to the policies and procedures, which are to be implemented. Therefore training should be reviewed on the basis of each initiative. The results of research (Recommendation 11) would provide a sound basis for developing training programmes that are closely matched to implementation and maintenance of the relevant standard.

### **Inspection**

14. The same considerations apply to inspection. Again standards may provide a foundation for developing inspection protocols. In this way consistency could be achieved.

## **Legislation**

15. If legislation is involved then there could be a period of at least two years between the time of publication of the legislation and the date in which traders are required to comply.
16. New Food Safety legislation can only be enforced with a great demand on staff time. Therefore, when devising any future new legislation, the implications on enforcement resources should be taken into account.

## **8. ACKNOWLEDGEMENTS**

The successful completion of this project has been heavily dependent on the enthusiastic co-operation of local authority officers, independent butchers and representatives of the supermarkets, which is greatly appreciated. I am also grateful to all our staff involved who had to conduct a large amount of work in a very short time. Finally thanks are due to the FSA in Scotland for financial support.



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**BUTCHERS' LICENSING INITIATIVE IN SCOTLAND**  
**QUESTIONNAIRE TO FOOD LAW ENFORCEMENT SERVICES**

This questionnaire is in 3 sections:

- A) BACKGROUND INFORMATION
- B) SUPPORT PROGRAMME to provide guidance and training for the butchers
- C) The planning and procedure involved in issuing licences

I appreciate that there may be some overlap between B) and C) but it is necessary to consider each aspect independently.

**A) BACKGROUND INFORMATION**

1. Name of Respondent:  
Address:

Telephone:  
Fax:  
e-mail:

2. How many staff were involved in:
- a) The support programme
  - b) The licensing
3. Please state the number of butchers in your area and if possible a breakdown with categories, for example:
- a) Single unit
  - b) Small chain
  - c) Large chain (i.e. multiples)
  - d) Mobile
  - e) Halal
  - f) Others
4. Please breakdown into:
- a) Fresh meat only
  - b) Raw/cooked – separation
  - c) Raw/cooked – HACCP

## **B) SUPPORT PROGRAMME**

1. What guidance did you receive from the Scottish Executive/FSAS on how the programme was to be conducted?  
Copies of any documents/correspondence would be appreciated.
2. Please give details of any courses/workshops etc provided/recommended.  
A list of the training organisations would be appreciated.
3. What was the rationale behind this programme?
4. What was the take-up? How many butchers attended?

Please list any other activities by your department to provide support for the butchers.

6. Do you know the cost to the butchers of attending the programme, e.g. hire of staff? If so please give details.
7. Please provide any information on how these activities were received by the butchers.

## **C) LICENSING**

1. What guidance did you receive from the Scottish Executive/FSAS? Copies of any documentation would be appreciated.
2. In your opinion was this guidance:
  - a) appropriate?
  - b) comprehensive?
3. Did you devise your own detailed plan on how to implement licensing?
4. Did individual officers have discretion to exercise their own judgement?
5. Please list the detailed criteria which had to be satisfied if a licence was to be granted.
6. Did you provide any guidance/instruction on how butchers might choose between HACCP and separation?
7. Are you aware of any differences between LAs in the way in which the licensing was implemented?
8. Please list any actions taken which involved LAs and SE/FSAS to co-ordinate the approaches taken.
9. Please list any difficulties/problems involved in implementing licensing.
10. What procedures did you have for resolving disagreements with the butchers?
11. In general has the initiative succeeded in achieving improved standards of food safety in butchers' shops?

Please explain your answer. It is particularly important to try to identify the factors contributing to the success or failure of the initiatives.

Please feel free to add any other comments.

I would like to discuss your answers with you on the telephone as soon as possible. Please indicate some timings that would be suitable for you. It may take approximately 30 minutes.

Thank you.



# VERNER WHEELOCK

## ASSOCIATES LIMITED

**Name of Owner / Manager:**

**Trading Address:**

**Tel. No:**

**Fax No:**

**E-mail address:**

Please tick the relevant boxes throughout the questionnaire

<b>A. Processes carried out in Shop</b>	<b>YES</b>	<b>NO</b>
1. Receive fresh meat and/or poultry		
2. Store fresh meat and/or poultry		
3. Cut and prepare fresh meat and/or poultry		
4. Prepare and display open and packed fresh meat and/or poultry		
5. Store and sell fish and/or fish products		
6. Store and sell frozen goods		
7. Manufacture sausages and/or burgers		
8. Cure meats		
9. Manufacture haggis, black puddings etc		
10. Pack and deliver customer orders		
11. Boil meats (and other wet) cooking processes		
12. Roast meats (and other dry) cooking processes		
13. Prepare any stir fry and/or marinated products		
14. Manufacture and bake hot pies		
15. Manufacture and bake cold pies		
16. Display open and/or packed cooked meats/meat products		
17. Display open and/or packed cheeses		
18. Display other ready to eat foods		
19. Store packaging and wrapping materials		
20. Store cleaning chemicals		
21. Any other processes which are not listed above		
Please add below:		

**B. Training:**

1a. Have you or your supervisory staff taken REHIS Intermediate Food Hygiene Course or RSH Certificate in Food Hygiene? 

YES	
-----	--

NO	
----	--

1b. Have you or your supervisory staff taken an equivalent qualification?

1c. If so, what was this qualification?

1d. Was the training done before the Butchers Licensing became law (i.e. before 30<sup>th</sup> March 2000)?

2a. Did the training give you a sufficient knowledge of HACCP/Separation to prepare for licensing?

YES	
-----	--

NO	
----	--

2b. How much of the training was relevant to your business?

All relevant	
--------------	--

Half relevant	
---------------	--

Mostly irrelevant	
-------------------	--

3a. Have all your staff received training to the elementary level?

YES	
-----	--

NO	
----	--

3b. If not, why not?

4a. Did you have any additional formal training about HACCP?

YES	
-----	--

NO	
----	--

4b. If so, what training was done before the Butchers Licensing became law, (i.e. before 30<sup>th</sup> March 2000)?

5a. Did you have the chance to meet with other butchers and Food Enforcement Officers at seminars / meetings?

YES	<input type="checkbox"/>
-----	--------------------------

NO	<input type="checkbox"/>
----	--------------------------

If yes, by whom were these meetings organized?

5b. Was this before the Butchers Licensing became law, (i.e. before 30<sup>th</sup> March 2000)?

### C. Preparing for Licensing as a Butchers' Shop

1a Did you choose to go for:-

Separation	<input type="checkbox"/>
------------	--------------------------

HACCP	<input type="checkbox"/>
-------	--------------------------

1b If you chose Separation, why did you choose this instead of HACCP?

2. Did you receive help to ensure you were able to achieve Separation/ HACCP?

YES	<input type="checkbox"/>
-----	--------------------------

NO	<input type="checkbox"/>
----	--------------------------

If yes, did you receive help from:-

Consultants	<input type="checkbox"/>
-------------	--------------------------

FEO's	<input type="checkbox"/>
-------	--------------------------

Other e.g.	<input type="checkbox"/>
------------	--------------------------

3. Was the help received:

	Highly satisfactory	Satisfactory	Poor
Consultants			
FEO's			
Other			





If yes – in what ways?		If no – in what ways?	
a) Greater awareness of what can go wrong	a)	f) Already had the highest standards	f)
b) More systematic approach	b)	g) Food safety had already been reviewed after the <i>E.coli</i> 0157 outbreak in Wishaw	g)
c) Staff work better together	c)	h) New procedures are too complicated	h)
d) Strict awareness of separation	d)	i) Far too much documentation	i)
e) Records are kept	e)	j) Other reasons e.g.	j)

**E. Customer expectations:**

1. Do your customers know you have a licence?

YES	<input type="checkbox"/>
-----	--------------------------

NO	<input type="checkbox"/>
----	--------------------------

2. Does the licence improve customer confidence in your products?

YES	<input type="checkbox"/>
-----	--------------------------

NO	<input type="checkbox"/>
----	--------------------------

3. Do you ever remind customers to keep raw and cooked meats separate?

YES	<input type="checkbox"/>
-----	--------------------------

NO	<input type="checkbox"/>
----	--------------------------

The consultant will telephone to make an appointment.

**Thank you for your help and time  
in completing this questionnaire.**

If you have any questions, please do not hesitate to telephone Jan Wheelock on 01756 700802.

## PROTOCOL FOR BUTCHER'S VISIT

Name of Butcher and Shop:

.....

Date Visited:

.....

Consultant:

.....

The five areas to be covered are as follows:

- [1] Management Commitment
- [2] The HACCP System/Separation
- [3] Implementation and Documentation
- [4] Support from Local Authority and Preparing for Licensing
- [5] Standards of Food Safety in the Premises

Feel free to make comments on the following pages and then indicate your score at the bottom of each page.

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>
----------	----------	----------	----------	----------

- A ~ excellent
- B ~ fully acceptable
- C ~ acceptable
- D ~ room for some improvement
- E ~ totally unacceptable

If necessary, add a few notes at the end of these sheets.

[1] **Management Commitment**

(Some parts of this may be largely subjective.)

- [a] Attitude – is the butcher positive and enthusiastic to talk to? Does this come through from the questionnaire too? Is he proud of his shop?
- [b] Training – who has been trained - did he just send others and not bother himself?
- [c] Is the butcher a good communicator?
- [d] Who took charge of preparing HACCP plans or ensuring that separation was absolutely strict? Was HACCP done by themselves or did someone external come in to do HACCP for them? Does the butcher understand HACCP?
- [e] Is he prepared to put resources (particularly financial) into the shop?
- [f] Is he on top of all the paperwork? Records need to be comprehensive and up to date.
- [g] Has the butcher got a good awareness of Food Safety? Is he concerned about customer confidence? What people say/think?

**Management Commitment**

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>
----------	----------	----------	----------	----------

[2] **The HACCP System/Separation**

[a] Select two HACCP Plans depending on what processes the butcher carries out:-

- cooking/cooling
- buying in ready to eat products
- making pies

Check over these two plans carefully.

[b] Are there any major holes? Have hazards been correctly identified? Is it over the top – may be because they don't understand it or they have put in too many CCP's?

[c] For separation, the list used by the FEO's may well be very useful (see list attached). Have they got strict separation?

**The HACCP System/Separation**

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>
----------	----------	----------	----------	----------

[3] **Implementation and Documentation**

- [a] Check on implementation/documentation.  
Follow critical limits, monitoring and corrective action.  
Are you confident with the HACCP system?
- [b] For separation – the list used by the FEO's may well be very useful [see list attached]. Have they got strict separation? Is documentation complete?
- [c] Look for evidence of slippage in standards e.g. not keeping up to date with records.
- [d] Flag up examples for HACCP systems that are working effectively, i.e. do the job without going over the top.
- [e] Flag up anything we can learn that can be applied to other sectors of food retailing.

**Implementation and Documentation**

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>
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[4] **Support from the Local Authority and Preparing for Licensing**

We are looking for an assessment on the quality of support from the Local Authority.

- [a] Was the support from FEO's helpful, reliable, accurate, user friendly?
- [b] Was there consistency on what they were telling butchers?
- [c] Was training subsidized? Did it cost the butcher in time and money?
- [d] Were they guided/told to go for Separation/HACCP?
- [e] Did it help the butcher to get on the "starting grid"?

**Support from the Local Authority and Preparing for Licensing**

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>
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[5] **Standards of Food Safety in Premises**

- [a] Are you sure that the butcher has good Food Safety procedures?
- [b] Are there any particular concerns?
- [c] Did you find anything that was definitely an unsafe practice?
- [d] How critical was licensing in improving standards of Food Safety? [Note: in many areas there had been considerable improvements after Wishaw but before licensing was introduced.]
- [e] What are the standards like in the Supermarkets?
- [f] The ultimate question:  
“Would you shop in these premises?”

**Standards in Food Safety in Premises**

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>
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Assessors were instructed to focus on the processes carried out at the premises and the documentation in place.

The processes examined included:

- Purchase and receipt of fresh meat, fish and ready-to-eat foods
- Storage
- Cutting, preparation and packing
- Display
- Packing and transport of orders
- Manufacturing minced meat and meat preparations (e.g. sausages, burgers)
- Manufacturing haggis and black puddings
- Curing
- Cooking joints, poultry
- Preparation and cooking of pies, pasties, brawn, potted meat, ready meals etc.

Where strict separation was in operation, it was necessary to check that there were separate counters, scales, slicing machines, boards, knives and cloths. Where separate staff were not employed, checks were to be made to ensure that procedures were in place to control cross-contamination.

The documentation checks:

- HACCP Plans ~ where appropriate
- Food intake, acceptance and rejection records
- Food storage temperature records
- Cooking and cooling temperatures
- Thermal measurement equipment checks and calibration
- Personal hygiene rules
- Hygiene practices
- Cleaning schedules
- Approved supplier records
- Pre-employment questionnaire
- Fitness to work records
- Training records
- Pest control records
- FEO visits
- Recipes
- Cleaning agents purchasing records

Details of unsatisfactory procedures to be recorded.

## QUALITY ASSURANCE SURVEY - SCOTTISH BUTCHERS PROJECT

### Programme

Following the briefing meeting held on 12.04.02, work was undertaken by all five assessors in the Glasgow and Edinburgh areas to allow me to witness their performance and ensure consistency of approach.

The programme was as follows:

Stuart Moffat	W & J Lewis, Milngavie	Independent butcher
Ken Driver	Tesco, Milngavie	Supermarket
Ruth Bell	Lahore Store, Edinburgh	Halal small butcher
Peter Clarke	Mark McGill, Currie	Independent butcher
J Sunderland	Sainsbury, Loanhead	Supermarket

My observations are summarised below.

#### Competence

All assessors demonstrated a good knowledge of the Retail industry, in particular the meat sector. There was a clear understanding of HACCP principles and practice and a sound knowledge of processing (and from one assessor a good knowledge of the Halal butchery aspects).

From their approach it was clear that all of the team were fully aware of the information needed for the survey.

#### Approach

A totally professional approach was made in all cases and the purpose of the survey was explained well by all the assessors in the opening meeting.

Interview techniques were very good, although it was necessary to stress to the butchers/managers that responses were confidential, particularly when questions were asked about Authority support and consistency of approach. In one case, there was initial resistance to the visit. This was overcome effectively and a good rapport established.

The survey was, in all cases, comprehensive and included the completion and/or review of documentation, HACCP evaluation where appropriate and a store inspection, following a logical flow. Review of records depended to some extent on the operation, but included process controls, cleaning, intake, temperature monitoring, supplier approval and training. Both recent and historical records were examined, where these were available.

## **Assessment of Standards**

A review meeting was held individually with all the assessors after the visit. I discussed their assessment of the store and my own observations and conclusions were in good accord. My recommendations were few in number, but included the need to examine training records/certificates to establish dates of training, rather than relying on the somewhat vague recollections of the store personnel.

## **Problems encountered**

- Difficulties of language were obvious in the Halal operation
- There was a lack of understanding on the part of the business in two cases, with regards to whether HACCP or separation had been chosen
- HACCP studies for Supermarkets are generally held centrally and hence are not available for assessment
- Historical records were not available in all cases.
- Costs were difficult to obtain, particularly where Corporate Technical functions had been involved. In Supermarkets re-fits are generally part of a rolling programme and it was not possible to establish whether the changes had been prompted by the licensing.

## **Conclusions**

Assessors demonstrated a professional and consistent approach. Assessments of standards in store although somewhat subjective, were none the less in close agreement with my own views.

*Janet Wilkinson*

**BACKGROUNDS OF ASSESSORS****RUTH BELL****QUALIFICATIONS**

B.Sc (Hons) Applied Consumer Science  
P.G.C.E.  
Post-graduate Diploma in Food Management  
Diploma in Food Hygiene  
Certificate in HACCP Principles  
Post-graduate Certificate in Food Law  
Lead Auditor with Registered Third Party Auditor Status

**PREVIOUS EMPLOYMENT**

Several years' experience in quality control and technical management in food manufacturing.

**PETER JOHN CLARK****QUALIFICATIONS**

HTEC Chemistry passed with 7 Distinctions and 4 Merits  
Registered Auditor (International Register of Certified Auditors)  
Royal Society of Health Certificate in HACCP Practice  
Advanced Food Hygiene Certificate (CIEH)  
MLC approved trainer and consultant

**PREVIOUS EMPLOYMENT**

Senior Quality Auditor – British Sugar

**KEN DRIVER****PROFESSIONAL QUALIFICATIONS AND TRAINING:**

Member of the Institute of Food Science and Technology (MIFST)  
Higher National Certificate in Food Technology  
Lead Assessor Certificate (ISO 9000 Campden Food & Drink RA)  
Group Training Certificate (CIEH/NSF International)  
HACCP in Practice Trainer (CIEH/NSF International)  
Advance Food Hygiene Certificate (CIEH)  
Member and a Director of the Society of Food Hygiene Technology (SOFHT)  
Approved consultant for the MLC accelerated HACCP scheme for butchers run by the MLC  
Course in strategic development and growth for small businesses completed at Durham University Business School

**PREVIOUS EMPLOYMENT**

Over 20 years' experience in quality assurance and technical management in food manufacturing.

## **STUART MOFFAT**

### **QUALIFICATIONS**

Diploma in Environmental Health  
Diploma in Advanced Food Hygiene  
Diploma in Meat Inspection  
Diploma in Health Education

### **PREVIOUS EMPLOYMENT**

20 years Local Authority Environmental Health Officer  
6 years Environmental Health Consultant C.W.S.  
5 years UK Training and Development Manager C.W.S.

## **JUDITH SUNDERLAND**

### **PROFESSIONAL EXAMINATION:**

Associate of the Institute of Health Service Management London	1976
Advanced Food Hygiene Certificate Credit Pass Chartered Institute of Environmental Health Officers	14 <sup>th</sup> March 1991
NVQ Assessor TDLB (D32 & D33)	1995
RSA STAGE 2 Computing and Word Processing	1996
HACCP Tutor's Course CIEH	March 2000
IRCA Lead Auditor (ISO 9001:2000)	2001
7307/02 Further and Adult Education Teachers' Certificate	2001

### **PREVIOUS EMPLOYMENT**

Self employed trainer and facilitator	1988 to date
Lecturer Skipton College	1996 to date
Food Business Advisor	September 1999 to date
Hotel Proprietor	1988 to May 1999

Senior Management and International Hospitals Group, Slough  
Training Consultant

General Manager Brook General Hospital, Greenwich London	1986- 1988
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Unit General Manager, Kent & Canterbury Hospital	1982- 1986
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