

To: Lead Food Officers  
cc: SFELC

7<sup>th</sup> February 2017

FSS/ENF/17/006

Dear Colleague

**For Information: FSA/FSS Guidance on the safety and shelf-life of vacuum and modified atmosphere packed chilled foods with respect to non-proteolytic *Clostridium botulinum***

Further to my earlier letter Ref ENF/E/16/011 the routine review of the FSA/FSS guidance document has been completed and the guidance has been updated accordingly. The public consultation closed on 30 June 2016 and we would like to thank those who responded. An updated version of the guidance, taking feedback and comments made during the consultation into account, has now been published on the FSA website:

<http://www.foodstandards.gov.scot/food-safety-standards/advice-business-and-industry/manufacturers>

The guidance is intended to assist food businesses, including manufacturers and retailers of chilled vacuum packed and modified atmosphere packed (VP/MAP) foods in the practical development and implementation of a HACCP (Hazard Analysis Critical Control Point) based approach for these foods. The guidance is also aimed at providing advice to help food law enforcement officers in carrying out their duties.

Although we have made certain changes as are indicated below, we also envisage putting the guidance through a wider scientific review in due course. Please see the FSA response to the consultation for more details

As mentioned in my previous letter Ref ENF/E/16/011 the following changes summarised below were made to the original guidance;

- Clarification of the scope of the guidance including that it covers all chilled VP/MAP foods
- Clarification on the advice that heat treatment of food should ideally be in a sealed pack including changes to the relevant flow diagram to make this clearer.

- New section on “Risks from other pathogens”. Whilst the primary focus of the VP/MAP guidance is on non-proteolytic *Clostridium botulinum* there are now additional references to resources on other pathogens that might be of concern.
- Updated references to legislation
- Clarification on the use of, and interpretation of results, of challenge testing when VP/MAP foods with a shelf-life greater than 10 days do not fulfil any of the controlling factors specified in the guidance
- Additional advice on the use of nitrites as a controlling factor

It is important to note that the final version of the revised guidance document published contains some changes following the consultation.

We have removed references to specific approaches to challenge testing. We do recommend that challenge testing is an effective means of determining a safe shelf life for specific products but that where this or other means of validation are used, the methodology must be suitable and carried out by someone with the appropriate expertise.

For a full summary of comments raised by consultees and the FSA/FSS responses please go to

<http://www.foodstandards.gov.scot/vacpac-consultation-summary-scotland-3-feb-2017>

Please be advised of these changes and take them into account when working with businesses throughout your Authority.

If you have any questions, please contact me using the email below;

[Enforcement@fss.scot](mailto:Enforcement@fss.scot)

Yours faithfully

Raymond Pang  
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Food Standards Scotland